

# ACER consultation: Revision of REMIT reporting (Guidance on reporting exposure under REMIT)

## Respondent's data

**Name and surname of the respondent:**

**Email Address:**

**Please select the type of organisation you represent:**

**Name of organisation:**

**Please specify the country of registration:**

## 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.

One of the key novelties was the introduction of the obligation on market participants to report information about their exposures, as part of the reporting obligations under Article 8 of REMIT and the recast Commission Implementing Regulation further clarified the context and details of exposure reporting under REMIT. In light of this, ACER will publish a guidance and the related electronic format to reflect the reporting requirements for exposure reporting. This consultation on the draft guidance and the electronic format will feed into the final outcome with the objective to gather practical feedback on specific aspects of exposure reporting, including data field definitions, reporting structures and technical implementation, to support the finalisation of the reporting format.

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 the proposed reporting requirements for exposure reporting.

Contact and deadline:

- The contact point for this consultation is [REMIT.Consultations@acer.europa.eu](mailto:REMIT.Consultations@acer.europa.eu).
- The deadline to reply to the consultation is **12/06/2026 17:00 (CET)**.

Remarks

It is important to underline that the Exposure schema, while prepared following ISO 20022 principles, is not a formally registered ISO 20022 message and does not have regulatory status. The schema shall maintain conceptual alignment with ISO 20022 through:

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

### **Supporting material**

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

- **Draft Guidance on reporting exposure under REMIT (v1.0):**  
**ACER\_REMIT\_Guidance\_on\_exposure\_reporting\_v1.0\_DRAFT\_v1\_for\_consultation.docx**
- XML schema definition (XSD) file containing the new electronic format:  
draft1.0\_REMITExposure\_V1.xsd
- Excel file providing an overview of the new formats, highlighting their rationale, the legal text from which the introduction is derived (where applicable) and the section of the survey where the change is featured: REMITExposure\_V1\_Model\_\_Consultation\_.xlsx

## Overall structure

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

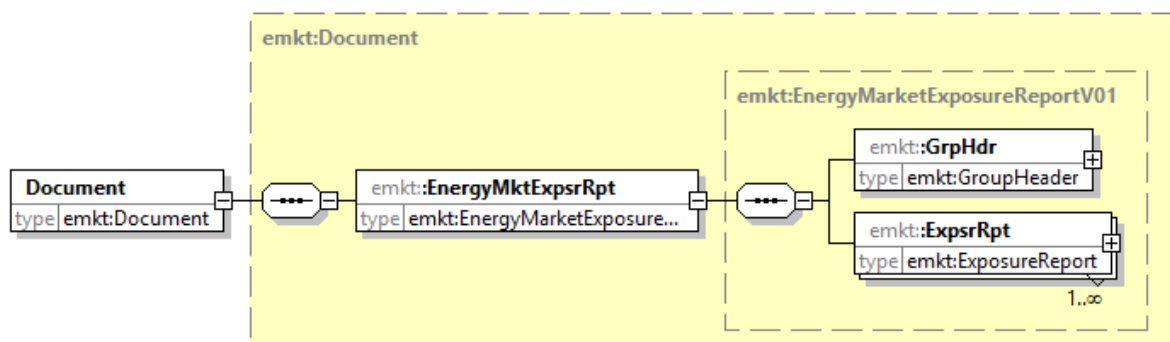
- Business Application Header (BAH) design principles reused for Document and GroupHeader1.
- Date and Time Types: ISODatetime, ISOMonthYear, aligned with ISO 20022 core type definitions.
- Identifier Types: EICIdentifier (based on ISO 20022 repository pattern for EIC codes), ACEIdentifier adapted for REMIT-specific participant codes. **To maintain cross-data harmonisation, the LEI code is also included.**
- Text Types: Max35Text, Max140Text, following the standard ISO 20022 length-restricted text structures.
- Unit of Measure: UnitOfMeasure10Code, created in line with ISO 20022 unit of measure codelist methodology.

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

The message consists of two principal sections:

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

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



**Do you agree with the overall schema structure?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

## Feedback:

We recognise the standing of ISO 20022 as an internationally recognised financial messaging standard, however, the ISO-like approach proposed by ACER risks generating confusion rather than delivering meaningful harmonisation.

Where the proposal departs from the ISO 20022 standard, those deviations should be explicitly documented, with ACER's official documentation serving as the sole authoritative reference. We would also caution against the use of terminology that borrows from ISO 20022 naming conventions without fully adopting them. Labels such as "GroupHeader" carry a precise technical meaning within the ISO 20022 framework; using them in a different or inconsistent way risks misleading those responsible for implementation. A naming convention that is clearly distinct and internally consistent would better reflect the custom nature of the schema and significantly reduce the scope for misinterpretation.

More fundamentally, we question whether exposure reporting is the right domain in which to pursue this harmonisation exercise. Exposure reporting is exclusively volume-based, and we do not consider it the most pressing or natural candidate for alignment with financial reporting standards. Any harmonisation effort should be strictly confined to a defined and limited subset of cross-cutting fields, and should not be allowed to spill over into the broader REMIT transaction reporting framework.

## Chapter 2 Reporting obligation

Chapter 2 of the guidance aims to describe the obligations in relation to exposure reporting under REMIT by focusing on the exposure perimeters and market participants in scope, as well as the applicable reporting timelines.

Respondents are invited to provide feedback on the draft proposals explained under each sub-chapter, by providing practical use case scenarios to substantiate the response (where applicable).

### 2.1 Exposure perimeters in scope

#### Feedback:

While the effort to define the reporting perimeter is appreciated, several aspects require further clarification.

#### BIOMETHANE

The text should explicitly confirm that biomethane injected into the natural gas grid falls within the regulatory definition of "gas," on the same basis as has already been established for LNG.

#### SPOT-TYPE PRODUCTS

The current exclusion of short-term products is limited to intraday and day-ahead markets. We consider this too narrow and propose extending it to all short-term products within a weekly horizon.

This point applies with particular force to LNG. The term "spot" as used in this context lacks the precision needed to accommodate LNG trading, which operates according to its own distinct timelines and cannot be mapped onto the conventional intraday or day-ahead framework applicable to other energy commodities. The definition of "spot" for LNG purposes should therefore be adapted to reflect the specific operational characteristics of this market.

## 2.2 Market participants in scope

### Feedback:

The wording on page 4 — "consequently, only market participants who enter into reportable transactions and are obliged to report records" — would benefit from further clarification. Our understanding is that only MPs required to be registered also fall within the scope of exposure reporting, meaning that MPs engaging exclusively in transactions referred to in Article 5(1), points (b), (c) or (d) of the Implementing Regulation are outside the scope of application. Confirmation of this reading would be welcome.

### OMP SUPPORT:

The Guidance should clarify that OMPs are expected to support market participants by providing volume position data in a format aligned with the prescribed exposure reporting structure and within the applicable reporting deadlines. This would promote consistent implementation and help ensure accurate and timely reporting across market participants.

### CALCULATION EXAMPLE:

We have reservations about the calculation example provided in Example 1 on page 5. In our view, delivery point granularity should be explicitly reflected in the calculation, with netting performed within each delivery point before the absolute value is derived. The current example does not make this sufficiently clear and risks being misapplied.

## 2.3 Reporting timelines

### Feedback:

Clarification is needed on how delivery obligations expressed in "gas day" units should be attributed for calculation and reporting purposes. Our understanding is that the relevant calendar day should be the day on which the gas day begins — so that, for example, a delivery scheduled for gas day 30 September, running from 06:00 on 30 September to 05:59 on 1 October, is attributed in full to 30 September. Confirmation that this interpretation is correct would be welcome.

## Chapter 3 Position reporting

Chapter 3 of the guidance aims to describe in detail the proposed requirements for position reporting in line with Article 6(2) of the recast REMIT Implementing Regulation by focusing on the definition, scope, and reporting structure (including the calculating) of positions. In addition the guidance also provides a proposal on how to interpret and implement the reporting of individual vs intra-group positions. Respondents are invited to provide feedback on the draft

proposals explained under each sub-chapter, by providing practical use case scenarios to substantiate the response (where applicable).

### **3.1 Definition and scope**

#### **Feedback:**

Consistently with our position on the definition of spot products, we request clarification on the scope of the spot market exclusion as it applies to position reporting.

As proposed above, the exclusion should not be confined to intraday and day-ahead products but should extend to all transactions with a delivery timeframe equal to or shorter than one week. This is particularly important given the forward-looking nature of exposure reporting: capturing short-term positions within this framework would serve no meaningful supervisory purpose and would impose a disproportionate burden on market participants.

In this context, confirmation is specifically sought that the exclusion covers week, weekend, and day-ahead products concluded on the turning days of a quarter — transaction types that sit at the boundary of the current definition and are therefore most exposed to interpretative uncertainty.

To avoid inconsistent application across market participants, we would welcome an express clarification in the text, set out upfront, that all transactions with a delivery timeframe of one week or less fall outside the scope of exposure reporting.

### **3.2 Structure of the position report**

#### **Feedback:**

We would prefer the exclusive use of "Contract type" rather than "Product type," in line with transaction reporting, supported by a transcodification list aligned with the permitted values in Tables 1 and 2. If a simplified structure is preferred, the following categorisation would be workable: Table 1 FW, Table 1 FU, Table 2 (fixed volume), and Options.

On delivery point or zone, we disagree with any requirement to report instances where production or consumption occurs outside the Union. The territorial scope of REMIT is clearly delimited: Article 2(4) of the Recast defines wholesale energy products by reference to supply contracts with delivery in the Union and derivatives relating to electricity or natural gas produced, traded or delivered in the Union. Extending exposure reporting to delivery points or nodes located outside the EU would go beyond what the legislator has authorised and would lack a lawful basis.

On the same logic, transactions executed on an EU venue but specifying delivery outside Europe should be excluded. Products traded on European venues may technically qualify as WEPs, but we do not regard them as relevant WEPs for exposure reporting purposes. Where they are nonetheless treated as in scope, the required level of delivery point granularity would need to be clarified.

For indices used to hedge derivatives across multiple EU countries, we propose that the relevant delivery country be the delivery zone of the referenced index, rather than that of the underlying physical delivery.

Lastly, clarification is requested on whether supply contracts are intended to cover both physical and financial products.

### **3.3 Calculation of the traded volumes**

### **3.4. Individual vs intra-group positions**

#### **Feedback:**

This is a new reporting framework, and the guidance needs to be precise enough to ensure consistent implementation from day one. One area where greater clarity is particularly needed is the definition of "intra-group" for exposure reporting purposes, which should be clearly distinguished from the equivalent concept used under transaction reporting. Leaving this ambiguous will produce divergent interpretations across market participants.

Our view is that "intra-group" in this context should cover entities sharing the position management function within a corporate group structure, including consolidated entities and entities linked through ownership or control. What it should not cover are relationships based purely on balancing responsibility or similar contractual arrangements that carry no corporate or ownership dimension. The reference to Balance Responsible Party structures in Section 4 sits uneasily with this principle: BRP services are routinely provided to end consumers with no group connection whatsoever, and treating such relationships as intra-group would distort the reporting perimeter. We recommend dropping this reference and grounding the definition exclusively in corporate and ownership ties.

The same issue arises with the broader concept of "group." The EU Accounting Directive definition is not the right starting point in this context. What matters for exposure reporting is not how a group is legally constituted, but whether entities actually manage their positions together — i.e. whether they operate within a shared risk management or portfolio management framework. This distinction matters even more when you consider that position management within a single corporate group can vary significantly by commodity and by country, and that the organisational picture at the forward-looking horizon of the report may differ from the legal structure at the time of reporting.

With special reference to the options presented to flag Exposure reporting group perimeter, please note that relying on the CEREMP register as the primary method for defining the group perimeter may be misleading. In situations involving ongoing mergers, acquisitions, or other corporate restructuring activities of a dynamic nature, given the ongoing technical difficulties and misalignment between the different NRAs on CEREMP register, the CEREMP view may not accurately reflect the actual group structure at any given point in time.

In order to improve consistent application among MPs, in particular during the starting phase, we suggest establishing a notification mechanism from the Agency to MPs in case of inconsistency in the group definition within exposure reporting submitted templates.

On a separate technical note, clarification is needed on the maximum number of times the relevant schema field may be repeated.

## Chapter 4 Forecast reporting

Chapter 4 of the guidance aims to describe in detail the proposed requirements for reporting forecasts at request of ACER in line with Article 6(1) of the recast REMIT Implementing Regulation by focusing on reporting forecast on production and consumption.

Respondents are invited to provide feedback on the draft proposals explained under each sub-chapter, by providing practical use case scenarios to substantiate the response (where applicable).

### Feedback on production forecast

-

### Feedback on consumption forecast

-

### General feedback on forecast reporting

Given the operational complexity of compiling forecast production and consumption volumes, we request that ACER commit within this Guidance to providing market participants with adequate advance notice of any such data request — no later than one full quarter before the reference quarter to which the obligation applies. It would also be helpful to understand what internal authorisation ACER requires to issue this additional data request.

Consistently with the position set out in Section 3.2 and with the definition of WEPs under REMIT, any data request issued by ACER under this provision should be strictly limited to production and consumption volumes associated with delivery points located within the Union. Volumes relating to production or consumption outside the EU fall outside the scope of the reporting obligation and should be excluded accordingly.

On geographical scope, production forecasts should be limited to volumes contractually committed for delivery to the EU and should not include production sold to non-EU destinations or where EU delivery has not yet been contractually secured. In the context of LNG facilities located outside the EU, for instance, including volumes not yet tied to an EU delivery point would risk double counting and misinterpretation of the data.

Where production takes place outside the Union but is contractually linked to an EU delivery point, it is not immediately clear why such production would fall outside the reporting scope, given that the underlying contract qualifies as a WEP under REMIT. This reading also appears consistent with the approach taken for LNG in the subsequent paragraphs, where a comparable extraterritorial production dimension is resolved by reference to the Union delivery point. We would welcome ACER's view on this.

## Chapter 5 Structure of the exposure report

Chapter 5 of the guidance aims to describe in detail the proposed structure of the exposure report per reference quarter, by focusing on the applicable aggregations per energy commodity, delivery point, delivery month, and product type.

Respondents are invited to provide feedback on the draft proposals explained under each sub-chapter, by providing practical use case scenarios to substantiate the response (where applicable).

### **Feedback on the proposed structure of the exposure report**

#### **Feedback:**

We wish to flag an important point to avoid future misunderstandings. Aggregated totals derived from transaction reporting and exposure reporting are not expected to be reconcilable and should not be directly compared. This is not a data quality issue, but rather a structural one.

The two frameworks differ in several fundamental respects, including the treatment of intra-group transactions, the population of entities required to report, the application of threshold criteria such as the 600 GWh calculation, and the way options are reflected in the exposure report. These differences are by design and reflect the distinct regulatory purpose of each obligation. The Guidance should acknowledge this explicitly, so that divergences between the two sets of totals are not misread as errors or inconsistencies requiring correction.

On a separate point, clarification is requested regarding the example table under "Structure of the exposure reporting (5)" relating to the Q3 2027 report, specifically whether the indicated date refers to the submission deadline from the market participant to the RRM, or from the RRM to ARIS.

## **Chapter 6 Lifecycle event of exposure reporting**

Chapter 6 of the guidance aims to describe in detail the interpretation of lifecycle reporting in the context of exposure reporting.

Respondents are invited to provide feedback on the draft proposals explained under each sub-chapter, by providing practical use case scenarios to substantiate the response (where applicable).

### **Feedback on lifecycle reporting**

#### **Feedback:**

We support ACER's proposal on this point, subject to a few targeted adjustments to improve clarity and operational readiness.

First, the section title should be changed to "Correction of Exposure Reporting" to better reflect its actual content and purpose. Second, the current second paragraph would read more naturally as the opening paragraph, as it speaks directly to the correction process. Leading with it would focus the reader's attention appropriately, whereas the current structure foregrounds lifecycle events which are not relevant to exposure reporting and whose inclusion may inadvertently suggest that lifecycle reporting obligations exist in this context.

## **Chapter 7 Reporting channel and format**

Chapter 7 of the guidance describes in detail the proposed reporting channel and format for exposure reporting, as elaborated in the document.

### **Feedback on Reporting channel and format**

## Data Field (1) ID of the market participant

### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
1	ID of the market participant	MktPtcptId	The field identifies the market participant by a unique code on whose behalf the exposure information is reported to ACER.

### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
ACER code LEI	Alphanumerical	12 20	A0643278W.EU

### **Reporting requirements:**

Respondents are invited to provide feedback on the proposed guidance for Data Field (1) identifying the ID of the market participant on whose behalf the exposure information is reported by the chosen RRM.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

### **Do you agree with the proposed reporting requirements for the Market Participant ID field?**

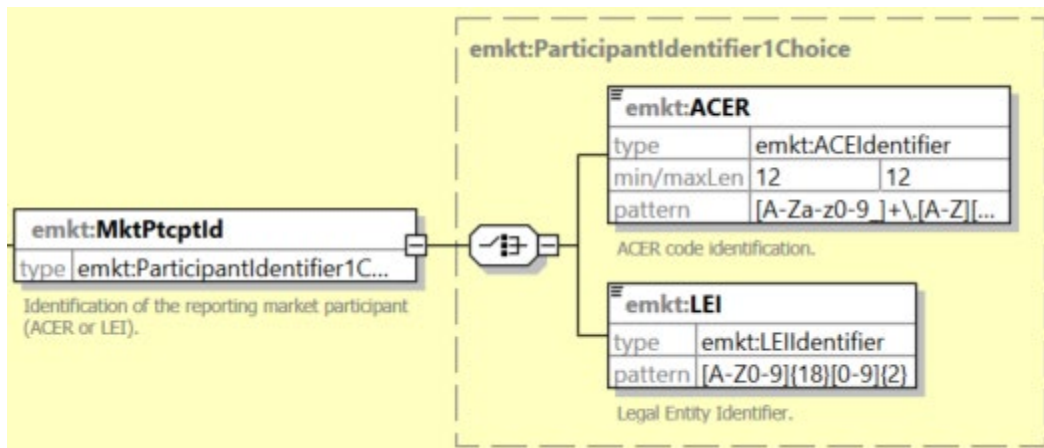
- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

### **Feedback on the corresponding section of the Exposure Electronic Format**

#### **Schema Structure:**



**Schema Attributes:**

```
<xs:element name="MktPtcptId" type="emkt:ParticipantIdentifier1Choice">
  <xs:annotation>
    <xs:documentation>Identification of the reporting market participant (ACER or LEI </xs:documentation>
  </xs:annotation>
</xs:element>
```

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

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

**Feedback:**

We would appreciate confirmation of our understanding of the field references used in this section, as some of the numbers appear to be inconsistent.

In our view, the use of sub-fields embedded within a single field, rather than separate distinct fields, is likely to be a source of confusion and may lead to inconsistent reporting practices across market participants. We would therefore suggest splitting the 'Net traded volume' field into three separate and clearly distinct fields, rather than retaining a single field subdivided into two sub-fields. This would considerably simplify the completion of the reporting file and reduce the risk of errors in practical application.

A review of the overall field structure with this principle in mind would improve clarity and support more consistent implementation.

## Data Field (2) Group definition

### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
2	ID of the market participant being part of the group	MktPtcptGrp	The field indicates the decision of the market participant identified in field (1) on the definition of a group for the reporting of intra-group and non-intragroup positions.

### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
<b>1 = CEREMP</b> <b>2 = User defined</b> <b>3 = Stand alone</b>	Numerical	1	1

### Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (2) indicating how the market participant defines its group perimeter in order to fulfil its obligation for exposure reporting in the context of intragroup vs non-intragroup positions.

**Do you agree with the proposed reporting requirements for the Market Participant Group field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

### **Feedback:**

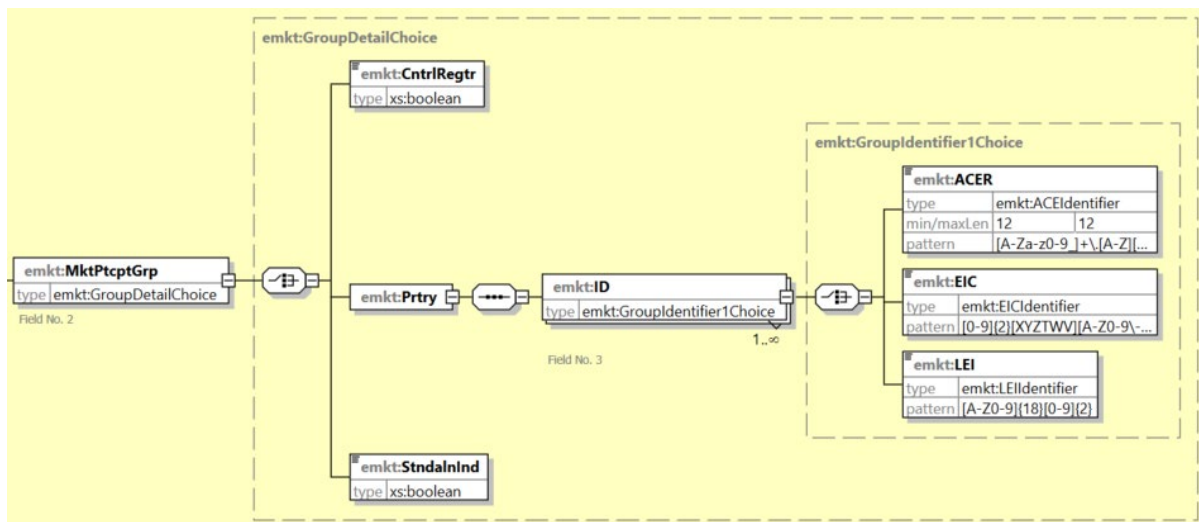
We would appreciate confirmation of our understanding of the field references used in this section, as some of the numbering appears to be inconsistent.

In our view, the use of sub-fields embedded within a single field, rather than separate distinct fields, is likely to be a source of confusion and may lead to inconsistent reporting practices across market participants. We would therefore suggest splitting the 'Net traded volume' field into three separate and clearly distinct fields, rather than retaining a single field subdivided into two sub-fields. This would considerably simplify the completion of the reporting file and reduce the risk of errors in practical application.

A review of the overall field structure with this principle in mind would improve clarity and support more consistent implementation.

## Feedback on the corresponding section of the Exposure Electronic Format

### Schema Structure:



### Schema Attributes:

```

<xs:element name="MktPtcptGrp" type="emkt:GroupDetailChoice">
  <xs:annotation>
    <xs:documentation>Field No. 2</xs:documentation>
  </xs:annotation>
</xs:element>

<xs:complexType name="GroupDetailChoice">
  <xs:choice>
    <xs:element name="CntrlRegtr" type="xs:boolean"/>
    <xs:element name="Prtry">
      <xs:complexType>
        <xs:sequence>
          <xs:element name="ID" type="emkt:GroupIdentifier1Choice"
            maxOccurs="unbounded">
            <xs:annotation>
              <xs:documentation>Field No. 3</xs:documentation>
            </xs:annotation>
          </xs:element>
        </xs:sequence>
      </xs:complexType>
    </xs:element>
  </xs:choice>
</xs:complexType>

```

```

        </xs:element>
        <xs:element name="Stndalnlnd" type="xs:boolean"/>
    </xs:choice>
</xs:complexType>

```

**Do you agree with the proposed implementation in the schema of the Market Participant Group field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (3) ID of the market participant being part of the group**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
3	ID of the market participant being part of the group	Usr-Dfn	The field identifies the market participant(s) by a unique code being part of the group as defined by the market participant identified in field (1).

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
ACER code	Alphanumerical	12	A0643278W.EU
EIC		16	
LEI		20	

Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (3) identifying the ID of the market participant(s) belonging to the group for the sake of exposure reporting.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Market Participant being part of a Group ID field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

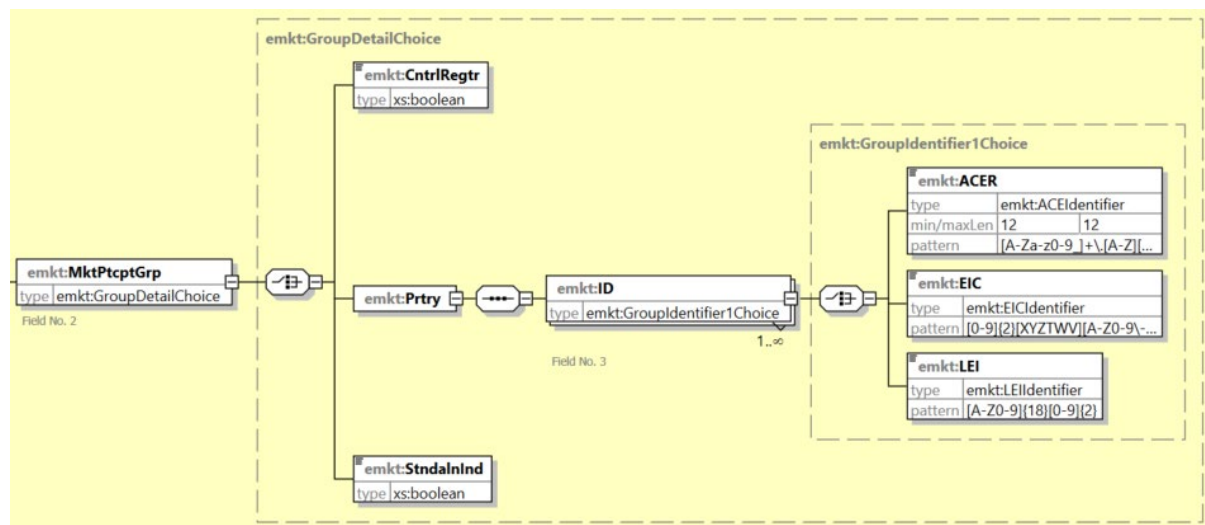
**Feedback:**

We would ask ACER to clarify the maximum number of ACER Code IDs that may be included in this field, as this information does not appear to be specified in the REMITExposure\_V1\_Model\_Consultation file. We would also welcome confirmation that the ACER code of the submitting MP is not required in this field.

We further note that, according to the Guidance, reporting a single unique identifier to represent the group as a whole is not permitted. In this context, we would ask ACER to clarify whether this rule implies that the reporting market participant itself must be included among the listed group members. This question is particularly relevant where a group consists of only two entities: if the reporting participant were to be excluded, the group representation would effectively be incomplete or inconsistent with the underlying reporting logic.

**Feedback on the corresponding section of the Exposure Electronic Format**

Schema Structure:



Schema Attributes:

```

<xs:element name="Prtry">
  <xs:complexType>
    <xs:sequence>
      <xs:element name="ID" type="emkt:GroupIdentifier1Choice"
        maxOccurs="unbounded">
        <xs:annotation>
          <xs:documentation>Field No. 3</xs:documentation>
        </xs:annotation>
      </xs:element>
    </xs:sequence>
  </xs:complexType>
</xs:element>
  
```

```

        </xs:sequence>
    </xs:complexType>
</xs:element>

```

**Do you agree with the proposed implementation in the schema of the Market Participant being part of a Group ID field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (4) RRM ID**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
4	RRM ID	RgstrRpstryId	The field identifies the RRM by its ACER code that is designated to reporting the exposure information to ACER on behalf of the market participant identified in field (1).

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
ACER code	Alphanumeric	12	B0643278W.EU

Reporting requirements:

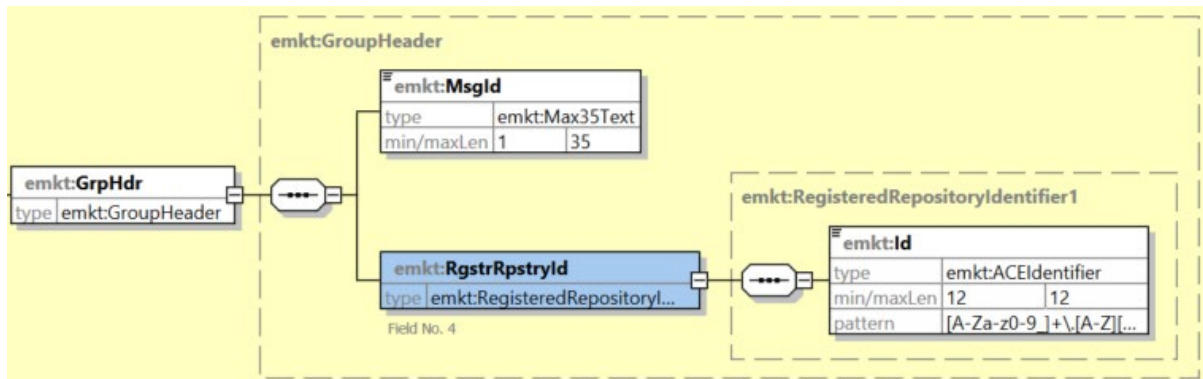
Respondents are invited to provide feedback on the proposed guidance for Data Field (4) identifying the ACER code of the designated RRM that is reporting the exposure report via the dedicated electronic format to ACER on behalf of the market participant.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

Do you agree with the proposed reporting requirements for the RRM ID field?

## Feedback on the corresponding section of the Exposure Electronic Format

Schema Structure:



Schema Attributes:

```
<xs:complexType name="GroupHeader">
  <xs:sequence>
    <xs:element name="RgstrRpstryId" type="emkt:RegisteredRepositoryIdentifier1"/>
  </xs:sequence>
</xs:complexType>
```

```
<!-- Registered Repository Identifier -->
<xs:complexType name="RegisteredRepositoryIdentifier1">
  <xs:sequence>
    <xs:element name="Id" type="emkt:ACEIdentifier"/>
  </xs:sequence>
</xs:complexType>
```

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

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

## Data Field (5) Report ID

### Data Field Description

No.	Field Identifier	Data Field in XSD	Description

5	QuestionReport ID	QuestionRptId	QuestionThe field uniquely identifies the exposure report submitted by the market participant for the given reference quarter.
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**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
Up to 50 alphanumerical digits	QuestionAlphanumeric	Question50	Question1234567890abcdefrgf

Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (5) indicating the unique identifier of the exposure report sent for the given reference period by the market participant.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

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

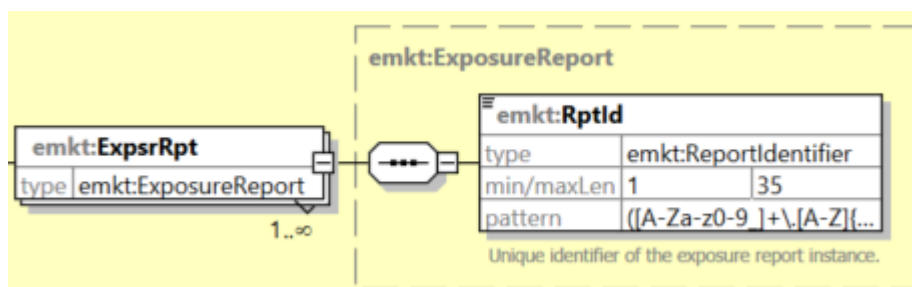
- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Feedback on the corresponding section of the Exposure Electronic Format**

Schema Structure:



Schema Attributes:

```

<xs:element name="RptId" type="emkt:ReportIdentifier">
  <xs:annotation>
    <xs:documentation>Unique identifier of the exposure report instance.</xs:documentation>
  </xs:annotation>
</xs:element>

```

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

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (6) Energy commodity**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
6	QuestionEnergy commodity	QuestionNrgyCmdty	QuestionThe field identifies the energy commodity the net trading position and, upon request, the forecasted production and consumption volume refers to in the exposure report.

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
EL = Electricity NG = Natural Gas	QuestionText	Question2	QuestionELE

Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (6) identifying the energy commodity of the product considered for the exposure reporting: natural gas, including LNG, or electricity.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Energy Commodity field?**

- Agree

- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

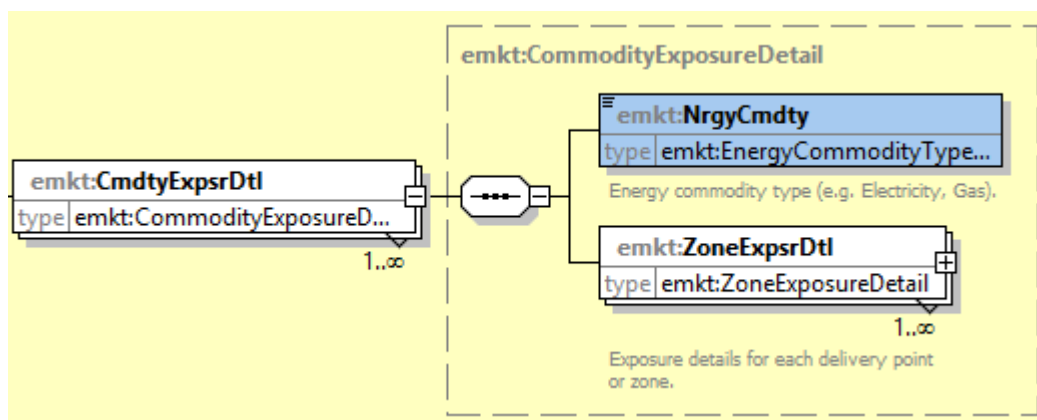
**Feedback:**

We would welcome clarification under the field description as to whether references to natural gas are intended to include biogas within the scope of reporting obligations.

*In addition, the word “bundled” in the paragraph starting “It is important to note how...” should be replaced with “unbundled” as the gas and electricity will be reported separately.*

**Feedback on the corresponding section of the Exposure Electronic Format**

Schema Structure:



Schema Attributes:

```
<xs:element name="NrgyCmdty" type="emkt:EnergyCommodityType1Code">
  <xs:annotation>
    <xs:documentation>Energy commodity type (e.g. Electricity, Gas).</xs:documentation>
  </xs:annotation>
</xs:element>
```

**Do you agree with the proposed implementation in the schema of the Energy Commodity field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (7) Delivery country**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
7	QuestionDelivery point or zone	QuestionDlvryPtOrZone	QuestionThe field identifies the country the net trading position and, upon request, the forecasted production and consumption volume refers to in the exposure report.

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
EIC or country code	QuestionAlphanumeric	Question16	Question10YXX-EUROPOW--8

**Reporting requirements:**

Respondents are invited to provide feedback on the proposed guidance for Data Field (7) identifying the delivery point (country) which the exposure information on positions and forecasted volumes refers to.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Delivery Point or Zone field?**

- Agree
- Do not agree
- No opinion

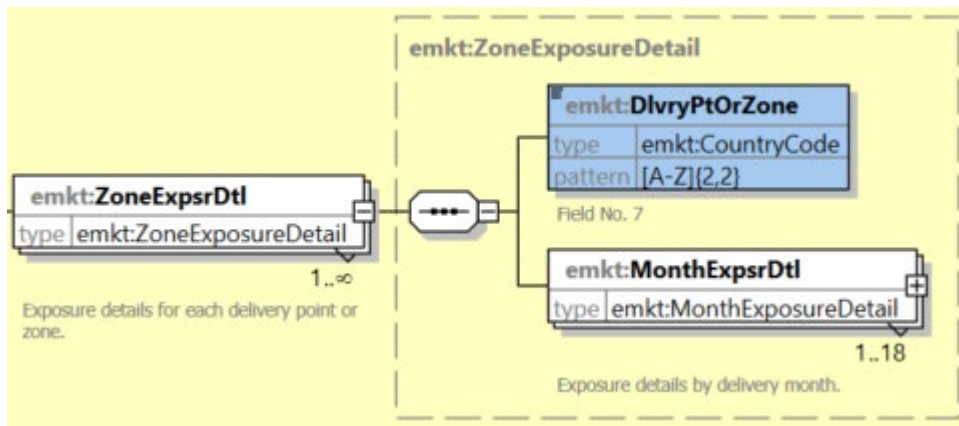
Please explain (optional) / If not agreed, please provide an alternative:

**Feedback:**

As noted in our response to Section 3.2, the distinction between EU and non-EU delivery gives rise to specific considerations that are equally relevant here. Data Field (7) should be restricted to EU country codes only, consistently with the territorial scope of REMIT and the nature of the exposure reporting obligation. The inclusion of a non-EU country code table in Annex I suggests that non-EU values may be accepted, which would risk an unintended broadening of scope and create ambiguity for reporting entities. We recommend non-EU country code table to be removed from Annex I.

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```
<xs:element name="DlvryPtOrZone" type="emkt:EICIdentifier">
  <xs:annotation>
    <xs:documentation>Identifier of the delivery point or zone (EIC code).</xs:documentation>
  </xs:annotation>
</xs:element>
```

**Do you agree with the proposed implementation in the schema of the Delivery Point or Zone field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (8) Delivery month**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
8	QuestionDelivery month	QuestionDlvryMnth	QuestionThe field identifies the delivery month the net trading position and, upon request, the forecasted production and consumption volume refers to in the exposure report.

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples

Year and month (YYYY-MM format)	QuestionAlphanumeric	Question7	Question2027-10
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**Reporting requirements:**

Respondents are invited to provide feedback on the proposed guidance for Data Field (8) identifying the calendar month for which the reported exposure information refers to.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Delivery Month field?**

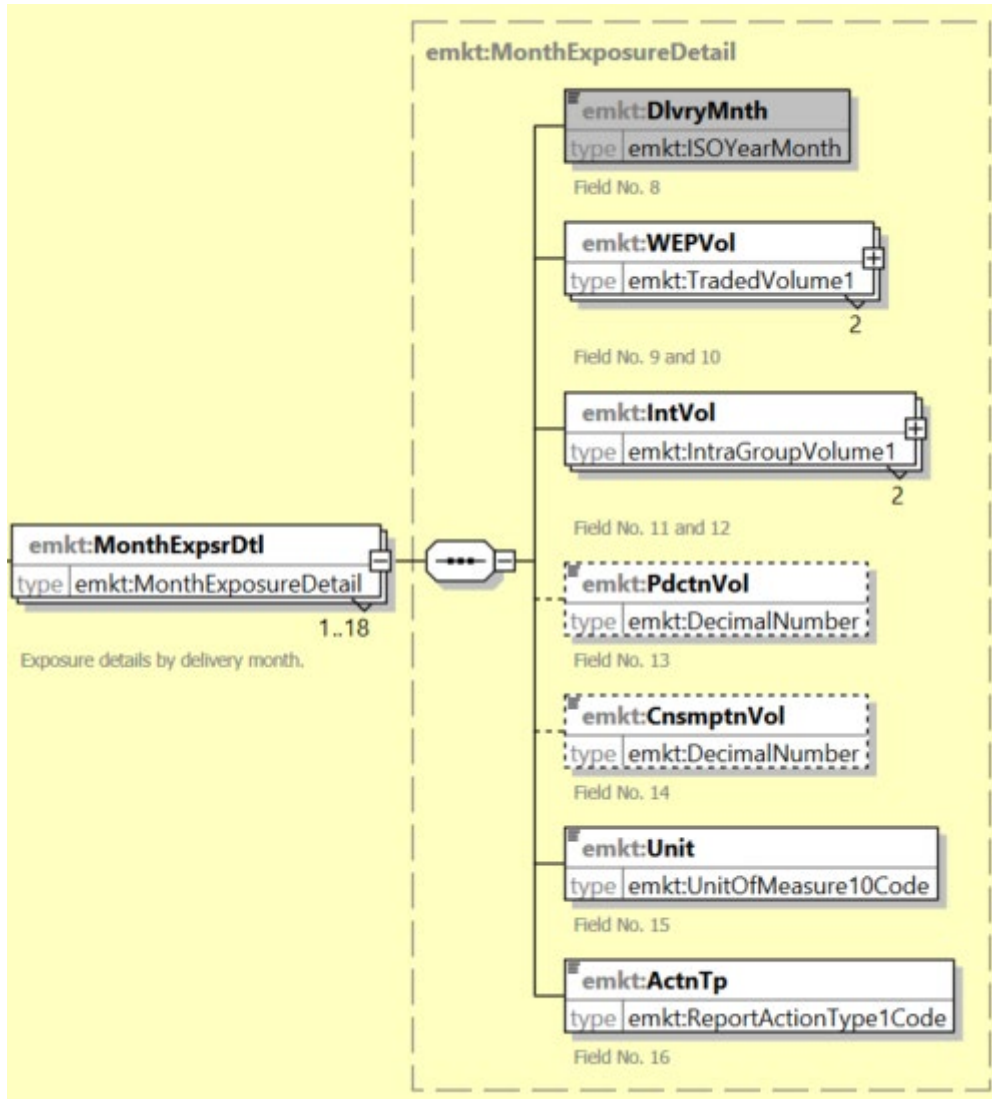
- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```
<xs:element name="DlvryMnth" type="emkt:ISOYearMonth">
  <xs:annotation>
    <xs:documentation>Delivery month (YYYY-MM format).</xs:documentation>
  </xs:annotation>
</xs:element>
```

**Do you agree with the proposed implementation in the schema of the Delivery Month field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

## Data Field (9) Contract type

### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
9	QuestionContract type	QuestionCtrctTp	QuestionThe field identifies the type of the contract the reported net trading position in field (10) refers to.

### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
FUFW = Futures and Forwards OPTN = Options	QuestionText	Question4	QuestionFUFW

### Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (9) indicating the differentiation between the net trading position split per contract type.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

### **Do you agree with the proposed reporting requirements for the Contract Type field?**

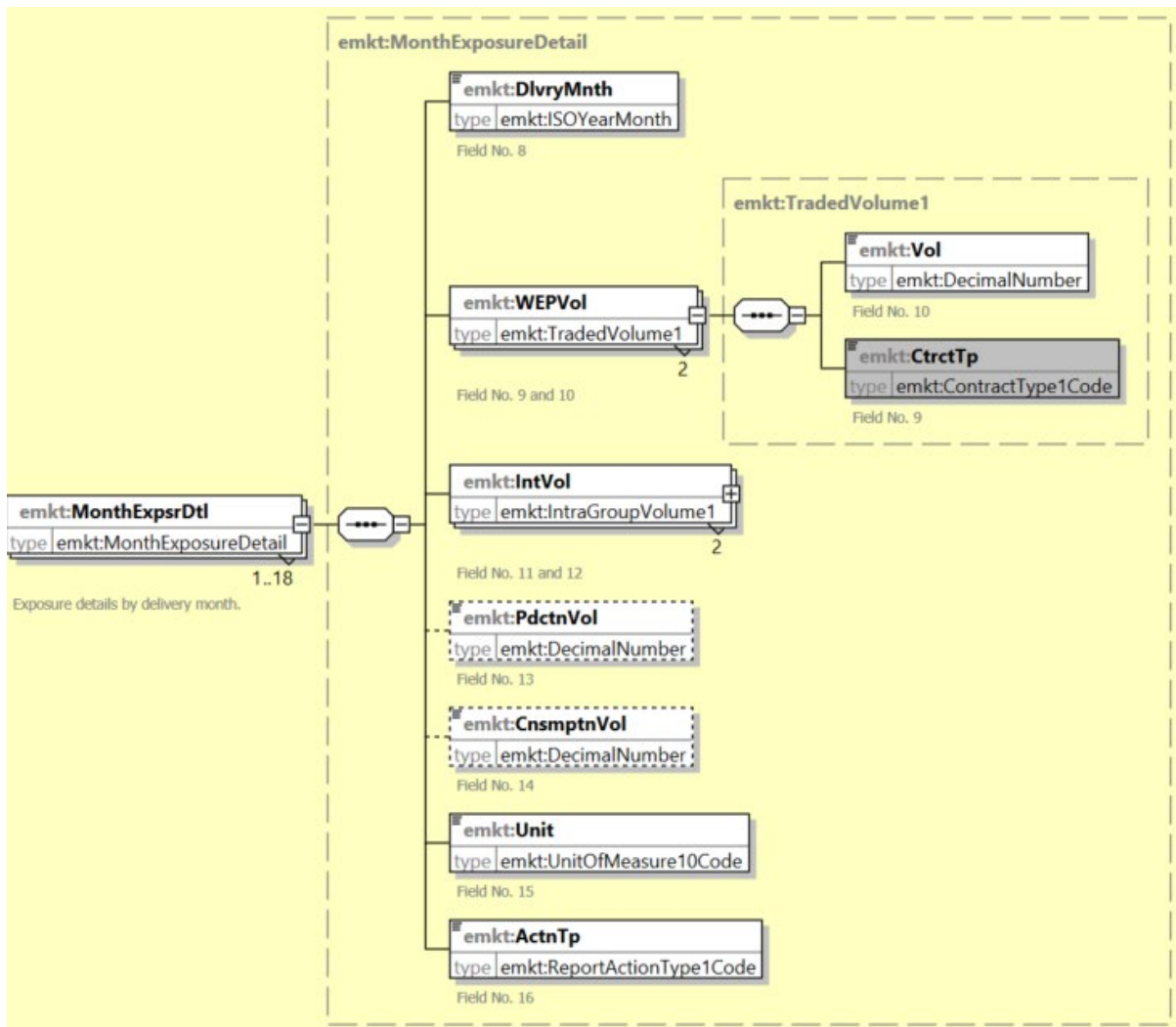
- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

### **Feedback on the corresponding section of the Exposure Electronic Format**

### **Schema Structure:**



**Schema Attributes:**

```
<xs:complexType name="TradedVolume1">
  <xs:sequence>
    <xs:element name="CtrctTp" type="emkt:ContractType1Code"/>
  </xs:sequence>
</xs:complexType>
```

```
<!-- Contract type list -->
<xs:simpleType name="ContractType1Code">
  <xs:restriction base="xs:string">
    <xs:enumeration value="FUFW"/>
    <xs:enumeration value="OPTN"/>
  </xs:restriction>
</xs:simpleType>
```

**Do you agree with the proposed implementation in the schema of the Contract Type field?**

- Agree
- Do not agree

- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

### Data Field (10) Net traded volume (per contract type)

#### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
10	Net traded volume (per contract type)	Vol	The field indicates the individual market participant's net trading positions split per product type.

#### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
Up to 20 numerical digits in the format xxxxx.yyyyy with a maximum of 5 decimals	Number	20	100

#### Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (10) indicating the net trading volume of the individual market participant split by the criteria as set out in Article 6(3) of the REMIT Implementing Regulation.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

#### Do you agree with the proposed reporting requirements for the Net Traded Volume (per contract type) field?

- Agree
- Do not agree
- No opinion

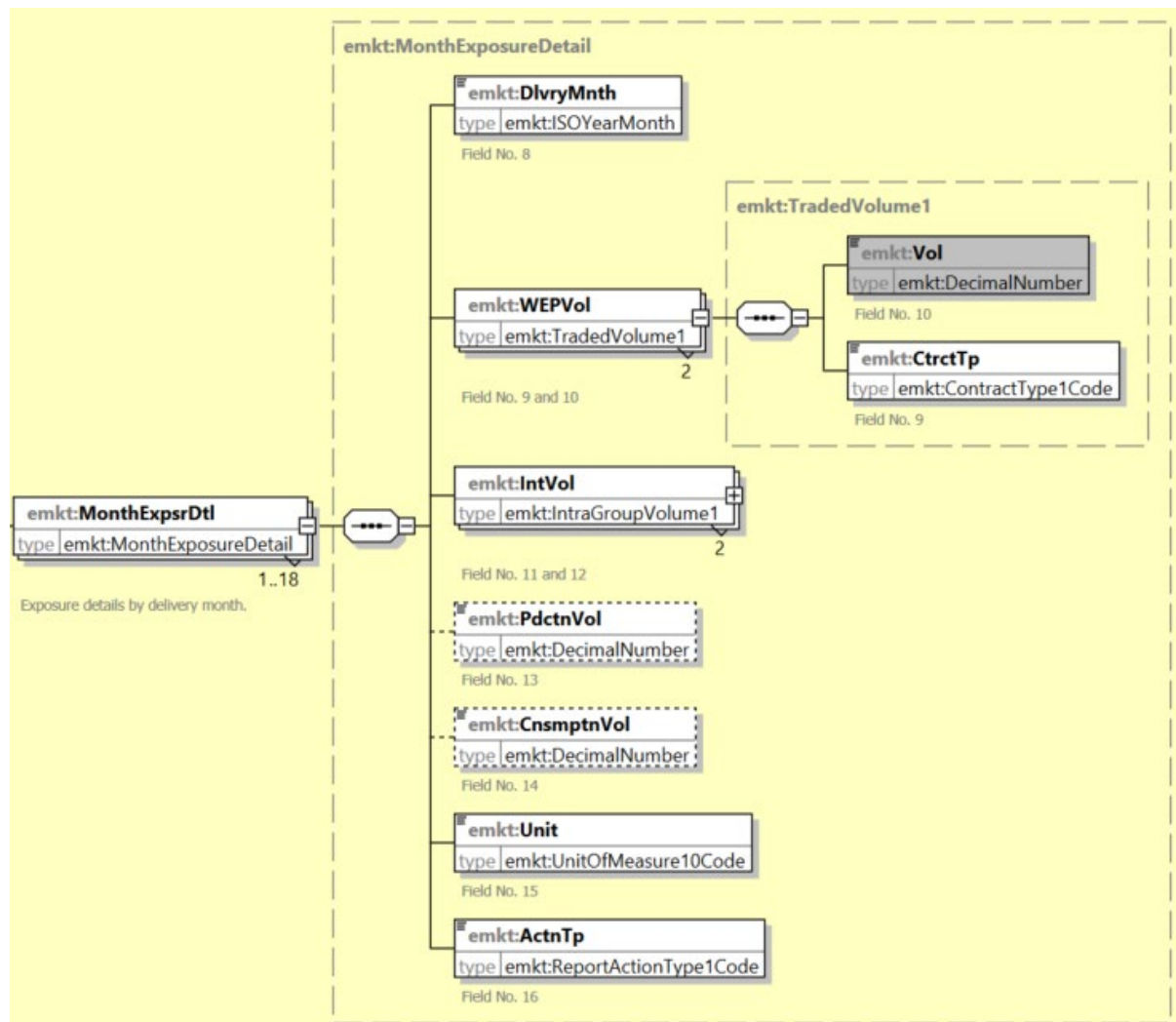
Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

With a view to improving the usability of the file, we would suggest separating the information on 'net traded volume (per contract type)' — currently embedded within a single field that must systematically be split into two sub-fields — into two distinct and independent fields. This would reduce the risk of inconsistent reporting and make the file considerably easier to complete in practice.

## Feedback on the corresponding section of the Exposure Electronic Format

### Schema Structure:



### Schema Attributes:

```
<!-- Traded Volume with Contract Type --> <xs:complexType name="TradedVolume1">
  <xs:sequence>
    <xs:element name="Vol" type="emkt:DecimalNumber"/>
    <xs:element name="CtrctTp" type="emkt:ContractType1Code"/>
  </xs:sequence>
</xs:complexType>
```

**Do you agree with the proposed implementation in the schema of the Net Traded Volume (per contract type) field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (11) Net traded volume (intra-group and non-intra-group)**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
11	Net traded volume (intra-group and non-intra-group)	Vol	The field indicates the market participant's intra-group and non-intragroup trading positions as indicated in field (12), if applicable.

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
Up to 20 numerical digits in the format xxxxx.yyyyy with a maximum of 5 decimals	Number	20	100

**Reporting requirements:**

Respondents are invited to provide feedback on the proposed guidance for Data Field (11) indicating the market participant's intra-group and non-intragroup trading positions as per the group type reported in Data Field (12).

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Net Traded Volume (intra-group and non intra-group) field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

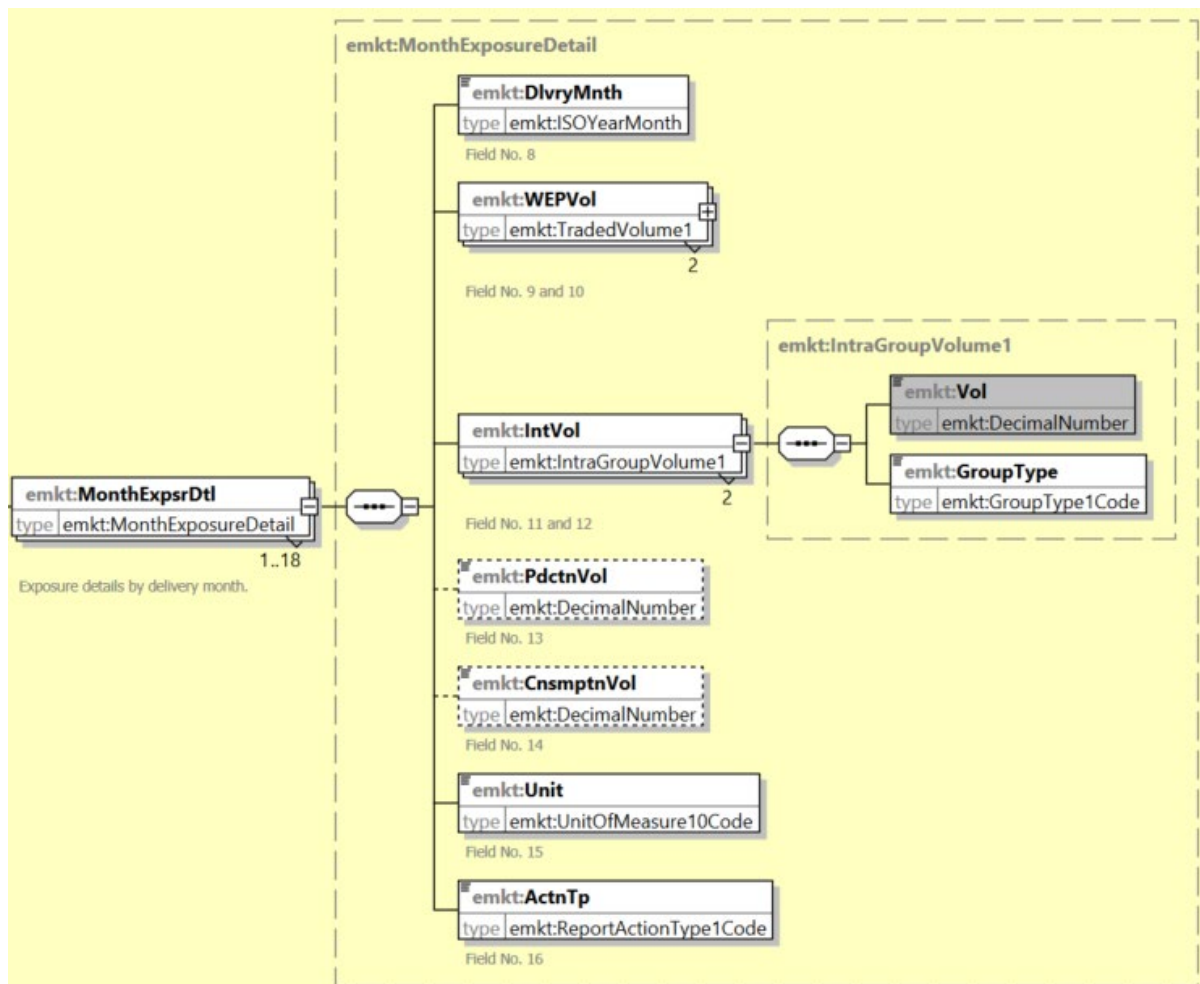
**Feedback:**

Reading Fields 11 and 12 together leaves some uncertainty, particularly regarding the exact role of "Group Type." Clearer guidance is also needed on whether the current sub-field structure nested under a parent field is intended to remain as is, or whether a migration to separate distinct fields is foreseen. This question has direct practical implications for how market participants design their reporting systems, and early clarity on the intended direction would be valuable.

On the unit of measurement, it is noted with concern that despite the apparent optionality in selecting the unit, electric units are in practice required for gas and LNG reporting as well, creating the need for ad hoc conversions that vary by contract type. To simplify the reporting process and ensure consistency across all commodity types, we would suggest adopting GWh as the single mandatory reporting unit and removing the unit of measurement field altogether.

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```
<!-- Intra Group Volume -->  
<xs:complexType name="IntraGroupVolume1">  
  <xs:sequence>
```

```

    <xs:element name="Vol" type="emkt:DecimalNumber"/>
    <xs:element name="GroupType" type="emkt:GroupType1Code"/>
  </xs:sequence>
</xs:complexType>

```

**Do you agree with the proposed implementation in the schema of the Net Traded Volume (intra-group and non intra-group) field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

**Data Field (12) Group type**

**Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
12	Group type	Group Type	The field identifies the volume information reported in Data Field (11) as intra-group or non-intra-group, if applicable.

**Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
INT = Intragroup NIN = Non-intragroup	Text	3	INT

**Reporting requirements:**

Respondents are invited to provide feedback on the proposed guidance for Data Field (12) identifying the net traded volume reported in in Data Field (11) as intra-group ('INT') vs non-intra-group ('NIN').

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Group Type field?**

- Agree
- Do not agree

- o No opinion

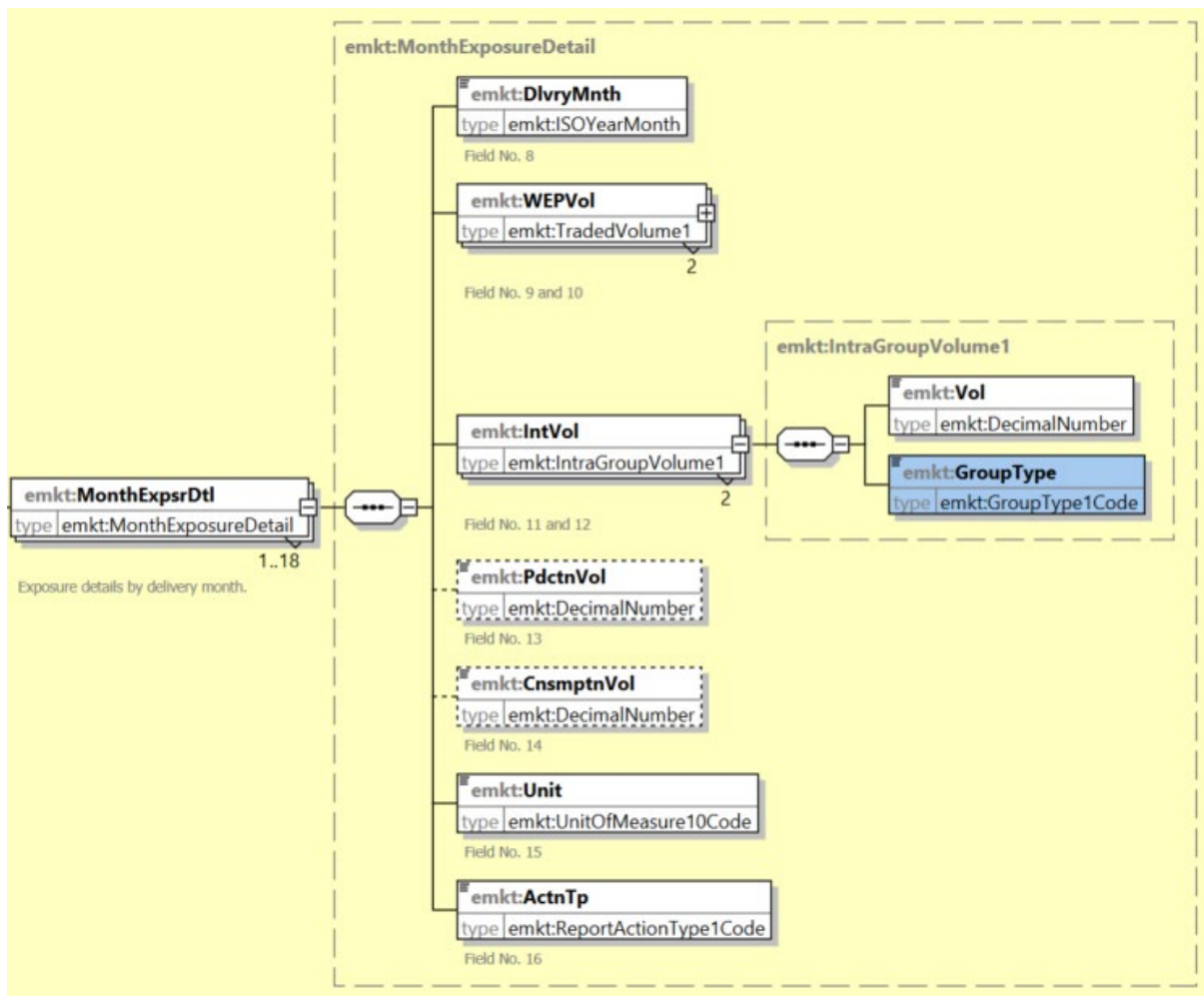
Please explain (optional) / If not agreed, please provide an alternative:

**Feedback:**

To improve the usability of the reporting file, we suggest separating the information currently captured within the single "Group Type" field, where two subfields must systematically be reported, into two distinct fields.

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```

<xs:complexType name="IntraGroupVolume1">
  <xs:sequence>
    <xs:element name="Vol" type="emkt:DecimalNumber"/>
    <xs:element name="GroupType" type="emkt:GroupType1Code"/>
  </xs:sequence>
</xs:complexType>

```

```

<!-- Group type list -->
<xs:simpleType name="GroupType1Code">
  <xs:restriction base="xs:string">
    <xs:enumeration value="INT"/>
    <xs:enumeration value="NIN"/>
  </xs:restriction>
</xs:simpleType>

```

**Do you agree with the proposed implementation in the schema of the Group Type field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

### **Data Field (13) Production volume forecasted**

#### **Data Field Description**

No.	Field Identifier	Data Field in XSD	Description
13	Production volume forecasted	PdctnVol	The field identifies the forecasted monthly volume for electricity or natural gas production.

#### **Data Field Accepted Values**

Description of Accepted Values	Type	Length	Examples
Up to 20 numerical digits in the format xxxxx.yyyy with a maximum of 5 decimals	Number	20	100

#### **Reporting requirements:**

Respondents are invited to provide feedback on the proposed guidance for Data Field (13) identifying the forecasted monthly volume for electricity or natural gas production.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

**Do you agree with the proposed reporting requirements for the Production Volume Forecasted field?**

- Agree
- **Do not agree**
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

**Feedback:**

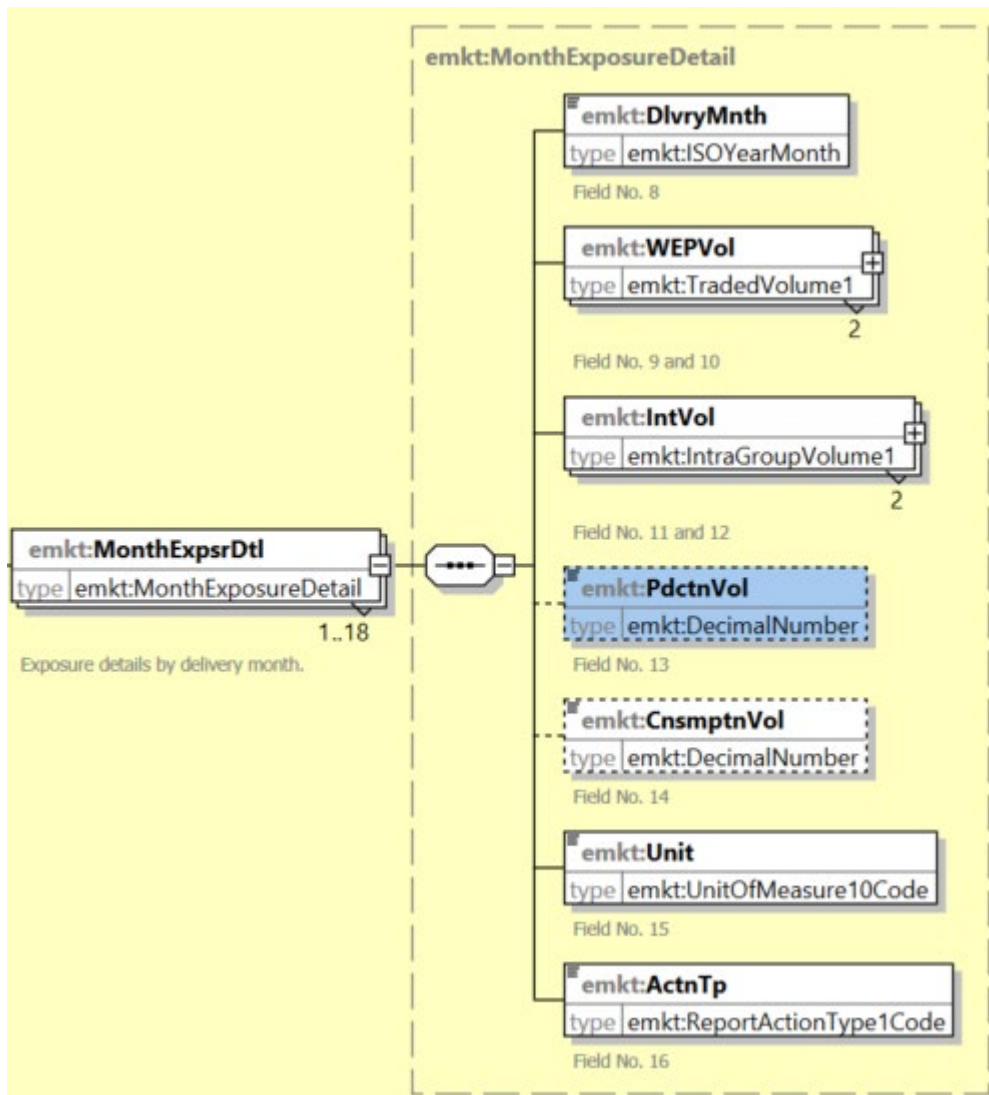
For consistency with Field (14), we suggest that the description of this field should include an equivalent explanatory sentence along the lines of "The field shall identify the estimated/forecasted volume for production by the market participant per month and per delivery country." This would ensure parallel treatment of the two fields and reduce the risk of divergent reporting practices.

In addition, all permitted values referenced elsewhere in the document should be consolidated within this section, giving market participants a single comprehensive reference point when consulting the Guidance.

On the unit of measurement, we reiterate the point raised earlier: the option to select the unit is only nominal in practice, as electric units are required for gas and LNG reporting as well, necessitating ad hoc conversions depending on the contract. We therefore suggest adopting GWh as the single mandatory reporting unit and removing the unit of measurement field entirely, in the interest of simplicity and consistency across commodity types.

**Feedback on the corresponding section of the Exposure Electronic Format**

***Schema Structure:***



**Schema Attributes:**

```
<xs:element name="PdctnVol" type="emkt:DecimalNumber" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Forecasted Volume produced in the
    month.</xs:documentation>
  </xs:annotation>
</xs:element>
```

**Do you agree with the proposed implementation in the schema of the Production Volume Forecasted field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

## Data Field (14) Consumption volume forecasted

### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
14	QuestionConsumption volume forecasted	QuestionCnsmptnVol	QuestionThe field identifies the forecasted monthly volume for electricity or natural gas consumption, based on the market participant's contracts concluded with its customers.

### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
Up to 20 numerical digits in the format xxxxx.yyyyy with a maximum of 5 decimals	QuestionNumber	Question20	Question100

### Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (14) identifying the forecasted monthly volume for electricity or natural gas consumption, based on the market participant's contracts concluded with its customers.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

### **Do you agree with the proposed reporting requirements for the Consumption Volume Forecasted field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

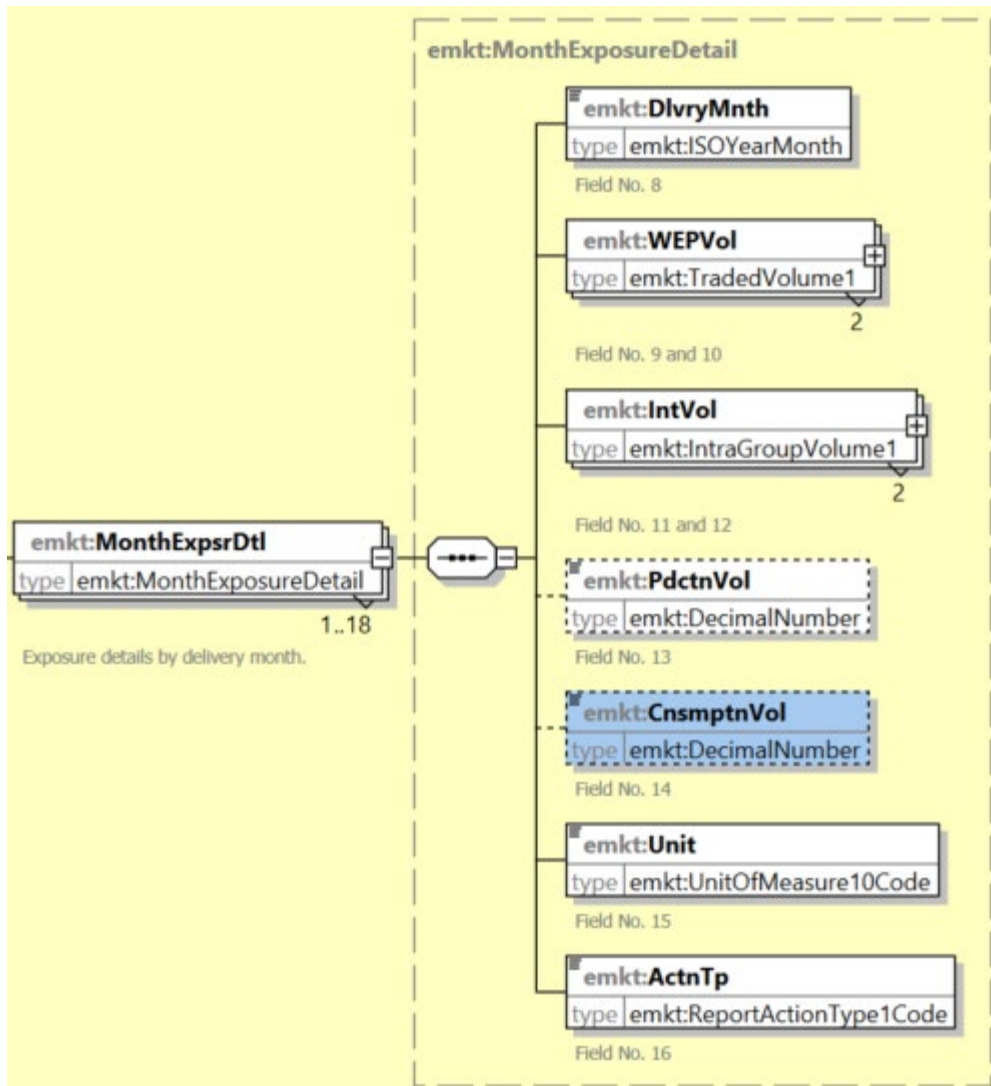
### **Feedback:**

To facilitate consultation of the Guidance, it would be helpful to consolidate within this section all the permitted values referenced elsewhere in the document, so as to provide MPs with a single, comprehensive reference point.

In addition, as already reported as feedback for Data Field 13, given that the option to choose the unit of measure is only nominal in practice, and that electric units of measure are required for reporting gas and LNG as well — thus necessitating ad hoc conversions depending on the contract — we suggest considering the adoption of a single reporting unit of GWh, and removing the field associated with the unit of measurement altogether.

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```
<xs:element name="CnsmptnVol" type="emkt:DecimalNumber" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Forecasted Volume consumed in the
    month.</xs:documentation>
  </xs:annotation>
</xs:element>
```

**Do you agree with the proposed implementation in the schema of the Consumption Volume Forecasted field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

### Data Field (15) Unit of measurement

#### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
15	QuestionUnit of measurement	QuestionUnit	QuestionThe field identifies the unit of measurement for the volume information reported.

#### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
MWh GWh	QuestionNumber	Question3	QuestionMWh

#### Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (15) indicating the unit of measurement for the volume information reported in Data Fields (11) and (12) relevant for positions and, upon request, in Data Fields (14) and (15) for forecast on production and consumption.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

#### **Do you agree with the proposed reporting requirements for the Unit of Measurement field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

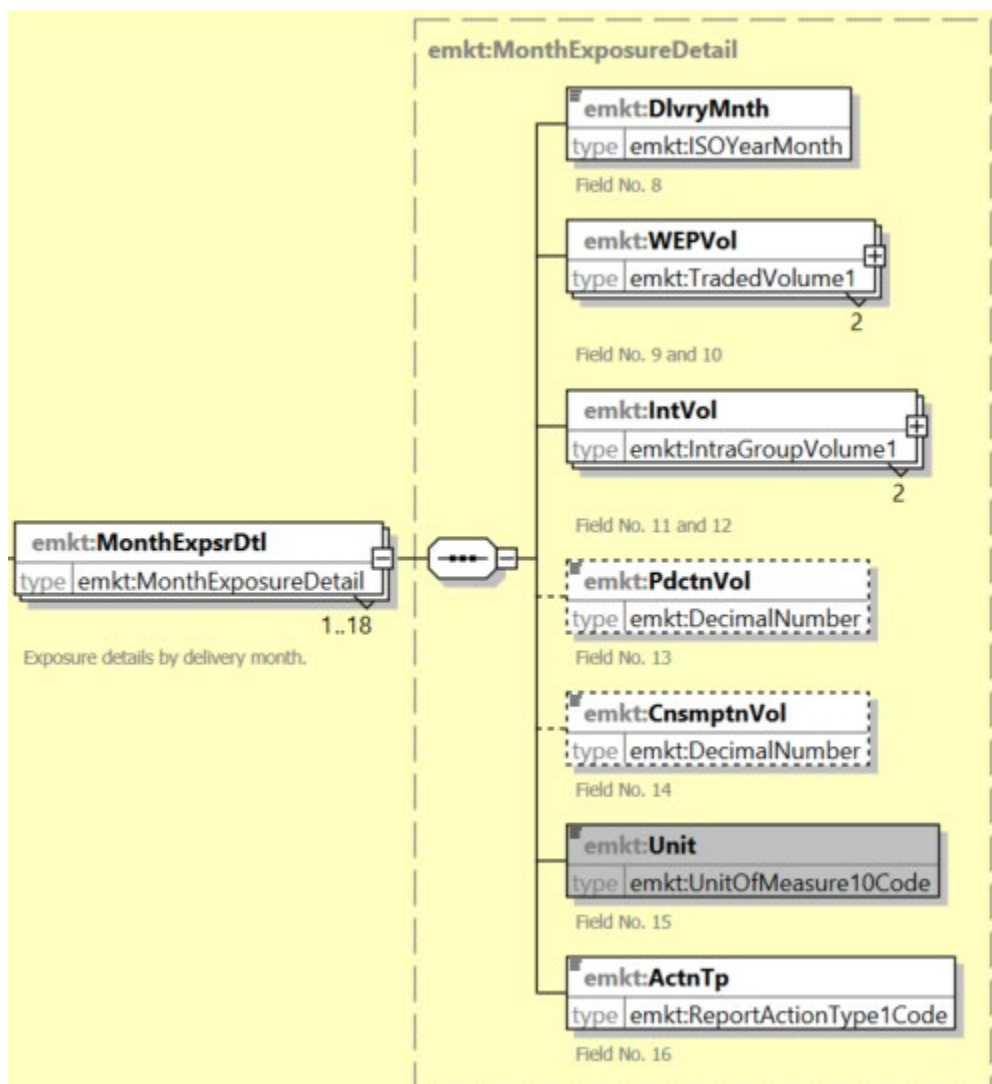
#### **Feedback:**

We reiterate that the option to select the unit of measurement is, in practice, purely nominal. Electrical units are effectively required for reporting gas and LNG alike, compelling market participants to carry out ad hoc conversions on a contract-by-contract basis. This makes the selection field not only superfluous but potentially a source of confusion. We would therefore strongly encourage ACER to evaluate the adoption of GWh as the single mandatory reporting unit and to remove the unit of measurement field altogether.

In general, the guidance would benefit from the inclusion of explicit standard conversion factors, for example MMBtu, GJ, Mm3, and other applicable gas units, with cross-references to all relevant fields.

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```
<xs:element name="Unit" type="emkt:UnitOfMeasure10Code">
  <xs:annotation>
    <xs:documentation>Unit of measure for volumes
    (MWh/GWh).</xs:documentation>
  </xs:annotation>
</xs:element>
```

**Do you agree with the proposed implementation in the schema of the Unit Measurement field?**

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

Feedback:

### Data Field (16) Action type

#### Data Field Description

No.	Field Identifier	Data Field in XSD	Description
16	Action type	Text	The field identifies the action type related to the lifecycle event of the reported exposure report.

#### Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
N = New M = Modify E = Error	Text	1	N

#### Reporting requirements:

Respondents are invited to provide feedback on the proposed guidance for Data Field (16) identifying the action type related to the lifecycle event of the reported exposure report.

Respondents are encouraged to provide practical use case scenarios to substantiate their response.

#### Do you agree with the proposed reporting requirements for the Action Type field?

- Agree
- Do not agree
- No opinion

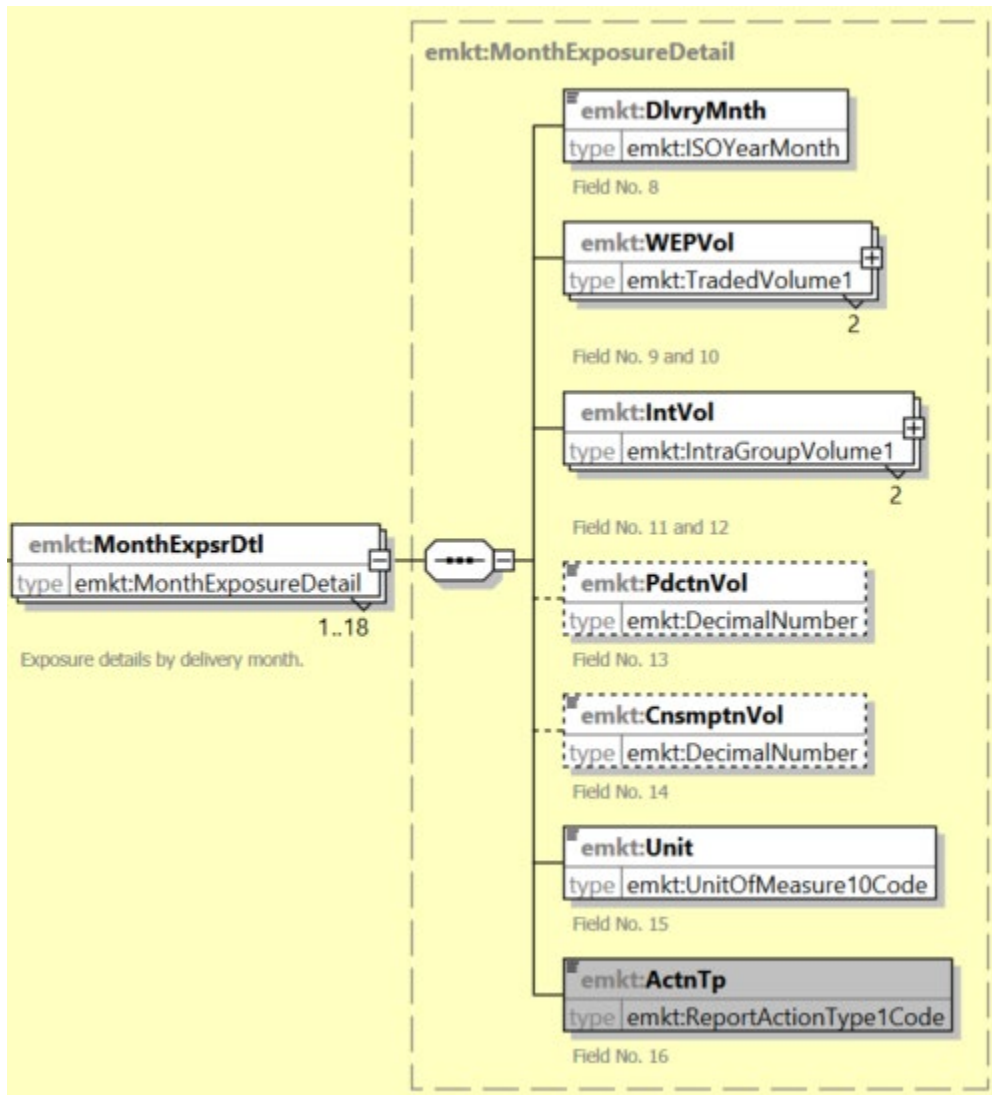
Please explain (optional) / If not agreed, please provide an alternative:

#### Feedback:

We would welcome clarification from ACER on whether, following an 'error' notification, a new submission of type 'new' carrying the corrected data is expected. More broadly, we would highlight the apparent lack of consistency in the management of action types between Exposure reporting and Transaction reporting, as the logic currently applied to action types in the context of Exposure reporting does not appear to mirror that used for Transaction reporting. Greater alignment between the two frameworks in this respect would be both desirable and beneficial for market participants in configuring their reporting systems.

**Feedback on the corresponding section of the Exposure Electronic Format**

**Schema Structure:**



**Schema Attributes:**

```
<xs:element name="ActnTp" type="emkt:ReportActionType1Code">
  <xs:annotation>
    <xs:documentation>Action type: New (N), Modify (M), Error
    (E).</xs:documentation>
  </xs:annotation>
</xs:element>
```

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

- Agree
- Do not agree
- No opinion

Please explain (optional) / If not agreed, please provide an alternative:

**Feedback:**

### **Annex I - Country codes as accepted delivery points for exposure reporting**

Annex I aims to list the EU and Non-EU country codes as accepted delivery points for exposure reporting.

**Feedback on Annex I:**

This list of country codes should be limited to EU-only countries, as their inclusion appears to go beyond the intended scope of the field.

### **Annex II - Reporting examples**

Annex II of the guidance aims to provide reporting guidance for use case scenarios received from stakeholders previously.

Respondents are invited to provide feedback on the draft proposals for the reporting requirements explained under each use case.

**Feedback on examples - Case 1**

**Feedback on examples - Case 2**

**Feedback on examples - Case 3**

**Feedback on examples - Case 4**

**Feedback on examples - Case 5**

**Feedback on examples - Case 6**

**Feedback on examples - Case 7**

Could you please further detail this PPA-related scenario?

**Feedback on examples - Case 8**

## **Additional feedback**

Please provide any additional feedback related to proposed reporting guidance and electronic formats under Exposure Reporting or other elements not included in the survey.

### **Feedback:**

The current consultation wave runs to more than ten parallel surveys, each covering extensive and technically detailed reporting requirements. This makes it genuinely difficult to respond to every question with the depth that regulatory changes of this complexity would normally warrant, and the feedback provided here should be read with that constraint in mind.

We would encourage future consultations to be structured in a more consolidated way, allowing stakeholders to engage with the material more holistically and provide more technically robust input.

This concern is particularly acute for exposure reporting, which is an entirely new domain for market participants. Fully understanding, assessing, and operationalising a framework of this kind requires time, detailed explanations, and significant internal alignment — none of which the available timeframe has adequately allowed for. The feedback on this topic is therefore necessarily less developed than we would have wished.

**End of the survey**