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ACER
European Union Agency for the Cooperation of Energy Regulators

ACER consultation: Revision of REMIT reporting (Guidance on reporting exposure under REMIT) - Second round

Fields marked with * are mandatory.

Respondent data

* First and last name of the respondent:

Caterina De Matteis

* Email Address:

cdm@iogp.org

* Please select the type of organisation you represent:

- [ ] Market Participant (MP)
- [ ] Organised Market Place (OMP)
- [ ] Registered Reporting Mechanism (RRM)
- [x] Association of Energy Market Participants (AEMP)
- [ ] Transmission System Operator (TSO)
- [ ] National Regulatory Authority (NRA)
- [ ] Other

* Name of organisation:

IOGP Europe

* Please specify the country of registration:

(•) EU-27

- ( ) Other country

* EU-27:

- ( ) Austria
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- ( ) Finland
- ( ) France
- ( ) Germany
- ( ) Greece
- ( ) Hungary
- ( ) Ireland
- ( ) Italy
- ( ) Latvia
- ( ) Lithuania
- ( ) Luxembourg
- ( ) Malta
- ( ) Netherlands
- ( ) Poland
- ( ) Portugal
- ( ) Romania
- ( ) Slovak Republic
- ( ) Slovenia
- ( ) Spain
- ( ) Sweden

Confidentiality and data protection

By taking part in this survey you confirm to have read the Data Protection Notice on External Webinars / Online Events and the Data Protection Notice on Interactions with Stakeholders.

Introduction to the survey

Following the recast of Commission Implementing Regulation (EU) No 2026/256 in April 2026, ACER is releasing for consultation a new set of guidance documents on transaction reporting, including the Transaction Reporting User Manual (TRUM), and related electronic formats. A two-round consultation with stakeholders will inform the final version to be published by the 29 October 2026:

- **First Round (16 April – 12 June 2026):** Covered proposed electronic formats and reporting guidance
- **Second Round (16 July – 4 September 2026):** Focuses **exclusively on the draft reporting guidance**, incorporating feedback from the first round via tracked changes and comments. While responses should primarily address these modifications, general feedback can also be provided in the free-text boxes or final section. Respondents are encouraged to share insights based on their market experience, reporting practices, and systems

How to Complete the Survey:

- Select one of three options: "**Agree**," "**Do not agree**" or "**No opinion**"
- Provide additional remarks where relevant

Supporting Materials:

- Draft Guidance on exposure reporting (v1.0)

Survey sections:

Chapter 2. Reporting obligation

- 2.1. Exposure perimeters in scope
- 2.2. Market participants in scope
- 2.3. Reporting timelines

Chapter 3. Position reporting

- 3.1. Definition and scope
- 3.2. Structure of the position report
- 3.3. Calculation of the traded volumes
- 3.4. Individual vs intra-group positions

Chapter 4. Forecast reporting

Chapter 5. Structure of the exposure report

Chapter 6. Lifecycle event of exposure reporting

Chapter 7. Reporting channel and format

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

Annex II - Reporting examples

Additional feedback

Contact & Deadline:

- Contact: REMIT.Consultations@acer.europa.eu

- Deadline: **4 September 2026, 23:59 (CET)**

Supporting material

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

Draft Guidance on exposure reporting (v1.0) - DRAFT v2
ACER_REMIT_Guidance_on_exposure_reporting_v1.0_DRAFT_v2_for_consultation.docx

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).

Chapter 2 Reporting obligation

- [ ] 2.1 Exposure perimeters in scope
- [x] 2.2 Market participants in scope
- [x] 2.3 Reporting timelines

2.2 Market participants in scope

We appreciate the clarifications introduced by ACER in the revised Guidance on Exposure Reporting, particularly with respect to the geographical scope of the reporting obligation and the assessment of the relevant threshold. However, we consider that additional guidance would help ensure a more consistent and proportionate implementation of the reporting framework, especially in relation to the following aspects. For instace in the guidance it is stated that "If a market participant has positions in more than one country, this assessment must be carried out for each country and then the absolute values shall be summed up for all relevant countries". It would be very important to present the example how it should be done in practice. How this should be done for exports and imports? Should an import position to particular country be marked with a (+) – 'purchase' – and an export position from this country with a (-) – 'sale'? Or is it done differently? Role of OMPs: we would welcome additional guidance clarifying that OMPs are expected to support market participants by making available volume position data in a way that is consistent with the prescribed exposure reporting format and with the applicable reporting deadlines. This would facilitate a harmonised implementation and support accurate and timely reporting.
– EU delivery criterion: we welcome the clarification included in footnote 1 that the geographical scope is defined by reference to positions with delivery in the EU. We suggest, however, that this clarification also be maintained in the body of the Guidance, rather than being included only in a footnote, to ensure greater visibility and legal certainty.
– Terminology on forecasts: the wording "and upon request information in case of forecasts" would benefit from further precision. The Guidance appears to address two distinct types of forward-looking information: the periodic reporting of trading positions and the reporting, upon request, of production and consumption

forecasts. To avoid ambiguity, we suggest referring expressly to “forecasted production and consumption information”, so as to clearly distinguish this obligation from the periodic reporting of trading positions.

2.3 Reporting timelines

We appreciate the clarifications introduced by ACER in the revised Guidance on reporting timelines, particularly the confirmation now included in the guidance for Data Field (8) that, for contracts expressed in gas day units, deliveries should be allocated to the calendar day on which the relevant gas day starts. We also welcome the clarification, grounded in Article 6(1) of the REMIT Implementing Regulation, that the applicable reporting deadline concerns the submission of exposure reports by the RRM to ARIS.

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).

Chapter 3 Position reporting

- [x] 3.1 Definition and scope
- [x] 3.2 Structure of the position report
- [x] 3.3 Calculation of the traded volumes
- [x] 3.4. Individual vs intra-group positions

3.1 Definition and scope

We support ACER’s objective of collecting high-quality exposure data to strengthen market monitoring under REMIT. However, the draft Guidance provides market participants with considerable discretion in several key areas, including the definition of the group perimeter, the allocation of volumes across delivery countries, the use of estimates in a number of reporting scenarios and the possibility to change the selected group definition between reporting periods.

At the same time, the Guidance expects reported exposure information to meet data quality standards, including completeness, accuracy and consistency. The combination of broad methodological flexibility and extensive reliance on market participants’ own estimates may result in materially different reporting outcomes for economically comparable situations, reducing the comparability and analytical value of the reported information. From the perspective of market participants, clear and sufficiently precise guidance is also essential to ensure a consistent interpretation of the requirements, facilitate compliance and reduce the risk of subsequent challenges regarding the correctness of the reporting approach adopted.

We therefore recommend that ACER further assess whether the proposed level of flexibility and estimation is consistent with the intended analytical use of the data and proportionate to the implementation effort required from both market participants and ACER. Greater harmonisation of key assumptions, particularly regarding group definition, use of estimates and volume allocation, would improve consistency, comparability and legal certainty for reporting entities.

Additional clarification is needed regarding the treatment of LNG transactions. For transactions concluded on an FOB basis, the final destination of the cargo may not be known at the time of contracting or reporting and may subsequently change. It is therefore unclear how market participants should assess whether the transaction relates to EU delivery and how the relevant delivery country should be determined for exposure reporting purposes. ACER should provide dedicated guidance and practical examples covering LNG FOB transactions and destination-flexible LNG cargoes. The Guidance should also clarify whether spot LNG transactions should be treated as forward transactions for classification purposes and how exposure reporting obligations apply where the discharge of a cargo extends across two reference quarters, in order to ensure consistency with the approach applied under LNG transaction reporting.

While we acknowledge ACER’s objective of distinguishing reportable positions from production and consumption forecasts, we do not support the proposed references to the Balance Responsible Party (BRP), nor to the concepts of “allocated volume” and “final position”. These notions may introduce interpretative uncertainty and could be misleading in the context of REMIT exposure reporting.

We also recommend using terminology that is applicable to both electricity and natural gas markets. The current explanation appears to rely on concepts specific to the electricity balancing framework, whereas exposure reporting under REMIT applies to both commodities. If our understanding of the purpose of the references to the BRP framework is correct, we would suggest replacing them with an alternative “cascading” methodology that is more consistent with the REMIT framework and can be applied transversally to both power and gas. Under such an approach, volumes should be attributed to a market participant’s production or consumption only where they relate to a contract entered into by that market participant with an entity that falls below the REMIT registration thresholds. Transactions between market participants would be included in the ordinary traded position, whereas transactions with non-market participant entities would be reflected in the production or consumption position of the market participant providing the exposure reporting data.

Finally, with regard to reportable products, we welcome the extension of the exclusion from intraday and day-ahead products to all products with a delivery horizon of one week or less, including weekly, weekend and quarter-turning products.

3.2 Structure of the position report

The guidance clarifies the treatment of biomethane injected into and transported through the natural gas network but does not address other gas products delivered outside the gas system, such as bioCNG, bioLNG, gas supplied to transport fuel stations or gas transported by trucks. Additional clarification is needed on whether such products fall within the scope of exposure reporting and on the criteria used to determine their treatment. This would ensure a consistent interpretation and application of the reporting requirements across market participants.

2. The guidance requires market participants to allocate volumes across multiple delivery countries based on their own “best estimate” but does not provide allocation principles or a common methodology. This may result in different reporting outcomes for economically identical transactions and reduce the comparability and

analytical value of the reported data. It would be greatly appreciated if ACER could provide clear allocation rules and practical examples, particularly for transactions involving multiple delivery countries, cross-border deliveries and export transactions

We welcome ACER's decision to consistently use the term "Contract type" throughout the Guidance and to align the reporting structure with the contract types already applied under the REMIT transaction reporting framework. This approach enhances both the coherence and practical usability of the Guidance.
However, we consider that further alignment is required with respect to the reporting treatment of non-applicable contract types. In particular, the Guidance should clearly differentiate between: (i) contract types for which the market participant has no reportable positions; and (ii) contract types for which reportable positions exist but lead to a net position equal to zero. In our view, the value "0" should be used only in the latter scenario, whereas the relevant field should remain blank where the contract type is not applicable or no occurrence exists.
Furthermore, clarification is requested as to whether the term 'supply contracts' encompasses both physical and financial products.

3.3 Calculation of the traded volumes

The draft guidance appears to contain a potential inconsistency between the requirement for market participants to ensure the completeness and accuracy of exposure reporting and the acknowledgement that estimated volumes may need to be used for non-standard contracts with flexible delivery characteristics. While ACER requires accurate reporting, the guidance does not specify the acceptable methodologies, tolerance levels or validation criteria for such estimates. Additional clarification would be welcome to ensure a consistent application of data quality requirements and to provide legal certainty regarding the use of estimated volumes in exposure reports.
In line with the comment already provided under Section 3.2, we believe that additional clarification is required on how to report delivery months for which no traded volume exists. The Guidance currently provides that a value of "0" should be reported where a market participant has no traded volume for a given delivery month. However, it remains unclear how market participants should treat cases where the relevant reporting element is not applicable. Since "0" may also indicate an actual net traded volume equal to zero, we consider that non-applicable cases should be subject to a different reporting treatment, in order to enhance data quality and avoid ambiguity in the interpretation of the reported information.

3.4 Individual vs intra-group positions

The draft guidance allows market participants to use different approaches for defining their group perimeter, including the CEREMP structure, a user-defined group and a stand-alone approach, and to change that choice between reporting periods.
While this flexibility may facilitate implementation, it may also result in comparable activities being reported on the basis of different group perimeters. Consequently, reported exposures may not be fully comparable across market participants or reporting periods, reducing the analytical value of the collected data.
From both a reporting and analytical perspective, a single and stable approach would provide greater clarity. Market participants would benefit from clearer reporting expectations, while ACER would receive data prepared on a more consistent basis and therefore easier to analyse and compare.
We therefore encourage ACER to consider adopting one common approach for defining the group perimeter for exposure reporting purposes.
2. Stability of the group definition
The draft guidance allows market participants to change their selected group perimeter definition between reporting periods. However, the purpose and expected benefits of such flexibility are unclear.
This approach may result in identical economic relationships being reported as intra-group in one reporting period and as non-intra-group in another, without any underlying change in the corporate or commercial

structure. As a result, the consistency, comparability and analytical value of the reported exposure data may be reduced.
We would welcome clarification on the rationale for allowing changes to the group definition between reporting periods. Unless there is a specific regulatory objective behind this flexibility, ACER should consider requiring a stable group definition, at least throughout a calendar year, in order to improve consistency and comparability of the reported data.
GMP (ENI) We welcome the flexibility granted to market participants to determine which of the three available options is most appropriate for defining the perimeter of their exposure reporting group, as well as the further clarifications introduced in the revised Guidance.
More generally, regardless of the option selected, we consider that the concept of “group” should always be grounded in a corporate ownership relationship. This would help prevent divergent interpretations and avoid inconsistencies between counterparties.
In this respect, we believe it is important to establish a clear correction process for cases where a market participant is inadvertently included in another market participant’s group. Such process should also provide for a notification by the Agency where the group lists submitted by the market participants concerned are not aligned.
We further recommend introducing a notification mechanism through which the Agency informs market participants of any inconsistencies identified in the group definitions submitted through exposure reporting templates. This would support a more consistent application of the framework across market participants, particularly during the initial implementation phase.
Given that exposure reporting represents a new reporting framework, we consider that detailed and sufficiently precise guidance is necessary to ensure consistent implementation by market participants and to minimise the risk of reporting errors.

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).

Chapter 4 Forecast reporting

- [x] Forecast on production
- [x] Forecast on consumption

Feedback on production forecast

We welcome ACER’s adoption of the proposed approach for the treatment of production and consumption outside the EU, particularly the use of the relevant EU entry or exit country for reporting purposes. To support a consistent implementation of this approach, we believe the Guidance should expressly clarify that production and consumption forecasts should be limited to volumes that are contractually linked to delivery within the EU. Accordingly, production that is not intended for delivery into the EU, or for which delivery into the EU has not been contractually secured, should fall outside the scope of the forecast.
With specific regard to gas, we believe the Guidance should clarify that forecasts relating to send-out from LNG storage or injection into storage should only be reported where the market participant actually holds the relevant

storage capacity. Otherwise, the market participant would not be able to reliably forecast the corresponding volumes

Feedback on consumption forecast

As already noted in relation to the production forecast section, the same consideration applies to the consumption forecast section with respect to injection into storage: such volumes should be included only where the market participant effectively holds the relevant storage capacity. We would also welcome clear guidance on the treatment of cargo reloading intended for extra-EU exports.
With regard to non-EU consumption, this should be reported only to the extent that it is relevant for EU exposure. For instance, where production within the EU is intended for export outside the EU, the corresponding consumption should be reported under the relevant EU exit country, namely the country through which the energy leaves the EU.
Furthermore, as explained in the General feedback on forecast reporting, we do not support the BRP-based approach referred to in Section 3.1 and suggest replacing it with an MP / non-MP approach.

General feedback on forecast reporting

We would like to reiterate our view that any obligation to submit production and consumption forecasts should be triggered only by a duly justified, clearly defined and appropriately scoped request. Such requests should be addressed to specific market participants on the basis of objective and transparent criteria, rather than operating as a general reporting obligation for a wider category of market participants subject to exposure reporting. In this respect, we believe that a single and consistent methodology should be established for triggering these requests, and we would welcome ACER making this methodology publicly available.

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

Chapter 6 Reporting events for exposure

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

Considering that exposure reporting establishes a new reporting framework, we recommend introducing a short transitional grace period of two working days during which corrections may be submitted without triggering formal error notifications. Such an approach would facilitate a smoother implementation phase, support data quality during the initial application of the framework, and enable market participants and RRMs to address early technical or interpretative issues without generating unnecessary compliance concerns.

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

Although the reporting start date is already defined in legislation, several important elements of the reporting framework are still being developed or consulted upon, including technical specifications and reporting documentation.
Timely publication of the final reporting requirements is important to allow market participants and RRMs to develop, test and implement the required solutions. We encourage ACER to provide the final technical documentation and implementation roadmap as early as possible and to clarify the approach in cases where a market participant is ready to report but its designated RRM is not yet technically prepared to support exposure reporting.

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

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
1 = CEREMP 2 = User defined 3 = Stand alone	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 (selected)
- No opinion

* If not agreed, please provide an alternative:

The draft guidance allows market participants to use different approaches for defining their group perimeter, including the CEREMP structure, a user-defined group and a stand-alone approach, and to change that choice between reporting periods.
While this flexibility may facilitate implementation, it may also result in comparable activities being reported on the basis of different group perimeters. Consequently, reported exposures may not be fully comparable across market participants or reporting periods, reducing the analytical value of the collected data. From both a reporting and analytical perspective, a single and stable approach would provide greater clarity. Market participants would benefit from clearer reporting expectations, while ACER would receive data prepared on a more consistent basis and therefore easier to analyse and compare.
We therefore encourage ACER to consider adopting one common approach for defining the group perimeter for exposure reporting purposes.

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 EIC LEI	Alphanumerical	12 16 20	A0643278W.EU

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

* If not agreed, please provide an alternative:

> As noted in our previous comments, we believe that each MP should determine and report its position solely on the basis of its own trading activities and resources. In our view, a position should only be reportable where the underlying commodity is owned by, or otherwise attributable to, the MP itself, rather than where the MP merely bears a back-up liability arising from another MP's imbalance. Similarly, without an ownership or control relationship, an MP cannot reasonably be expected to provide reliable forecasts for assets that are fully operated and managed by an independent third party.
> In addition, with regard to the newly introduced text, we believe that the reference to the EIC code is missing from the description. This appears inconsistent with the subsequent paragraph, where the EIC code is listed among the permissible values.

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	Alphanumerical	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?

- [ ] Agree
- [x] Do not agree
- [ ] No opinion

* If not agreed, please provide an alternative:

To facilitate implementation, we recommend introducing a clearer distinction between fields reported at GroupHeader level and those reported within the body of the report. This would be particularly useful for RRMs developing reporting pipelines, as it would allow them to clearly separate the construction of the reporting envelope from the population of the reporting payload.

Data Field (5) Report ID

Data Field Description

No.	Field Identifier	Data Field in XSD	Description
5	Report ID	RptId	The field uniquely identifies the exposure report submitted by the market participant for the given reference quarter.

Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
Up to 50 alphanumerical digits	Alphanumeric	50	1234567890abcdefrgf

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

Data Field (6) Energy commodity

Data Field Description

No.	Field Identifier	Data Field in XSD	Description
6	Energy commodity	NrgyCmdty	The 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	Text	2	ELE

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

Data Field (7) Delivery country

Data Field Description

No.	Field Identifier	Data Field in XSD	Description
7	Delivery point or zone	DlvryPtOrZone	The 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	Alphanumeric	16	10YXX-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 Country field?
- ○ Agree
- ○ Do not agree
- ◉ No opinion

Data Field (8) Delivery month

Data Field Description

No.	Field Identifier	Data Field in XSD	Description
8	Delivery month	DlvryMnth	The 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)	Alphanumerical	7	2027-10

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
- [x] No opinion

Data Field (9) Contract type [UPDATED]

Data Field Description

No.	Field Identifier	Data Field in XSD	Description
9	Contract type	CtrctTp	The 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
FW = Forwards FU = Futures OP = Options	Text	2	FW

Reporting requirements:

Respondents are invited to provide feedback on the proposed UPDATED guidance for Data Field (9).

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
- (selected) Do not agree
- No opinion

* If not agreed, please provide an alternative:

We note that the text appears to contain a drafting error: the reference should be to “three contract types” rather than “two contract types”. This is because three contract types should be taken into account when splitting the net trading position by contract type for aggregation purposes and for the subsequent calculation.

Data Field (10) Net traded volume [UPDATED]

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 contract type for intragroup and non-intragroup position. [UPDATED]**

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 UPDATED 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 field?

- ○ Agree
- ◉ Do not agree
- ○ No opinion

* If not agreed, please provide an alternative:

As already noted in Sections 3.2 and 3.3, we would like to reiterate that the value zero (0) should be reported only where the relevant position is fully offset or balanced. Conversely, where the applicable scenario does not arise, the corresponding field should remain null rather than being populated with a zero value.

Data Field (11) Net traded volume (intra-group and non-intra-group) [TO BE DELETED]

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

Respondents are invited to provide feedback on the proposed deletion of Data Field (11).

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

- ○ Agree
- ○ Do not agree
- ● No opinion

Data Field (12) Group type [TO BE DELETED]

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

Respondents are invited to provide feedback on the proposed deletion of the field.

* Do you agree with the proposed deletion of the Group Type field?
- Agree
- Do not agree
- No opinion (selected)

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.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 (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

Data Field (14) Consumption volume forecasted

Data Field Description

No.	Field Identifier	Data Field in XSD	Description
14	Consumption volume forecasted	CnsmptnVol	The 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	Number	20	100

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
  - (x) No opinion

Data Field (15) Unit of measurement

Data Field Description

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

Data Field Accepted Values

Description of Accepted Values	Type	Length	Examples
MWh GWh	Number	3	MWh

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 Field (10) relevant for positions and, upon request, in Data Fields (13) and (14) 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

* If not agreed, please provide an alternative:

We acknowledge ACER's decision not to require the use of a single unit of measure. However, we would reiterate that any further intervention after the publication of the official documents should be avoided to the greatest extent possible, in light of the system developments, implementation timelines, cascading processes and investments that market participants are putting in place to industrialise this reporting framework.
We consider that the unit of measurement should be limited to GWh for all relevant volume reporting. This approach would reduce the risk of inconsistencies arising from parallel unit systems and avoid unnecessary conversion-related discrepancies. Should additional granularity be required, we would suggest introducing additional units – such as MMBtu, GJ, Mm^3 and other applicable gas units – within the reporting framework. Alternatively, the Guidance should include explicit standard conversion factors, beyond MMBtu, for other applicable gas units.

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 of the exposure report reported.

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 reportable event for the 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

* If not agreed, please provide an alternative:

We would ask ACER to provide further clarification on the treatment of the identification codes reported in Data Field (3) for market participants belonging to a group, particularly where such codes need to be amended and resubmitted with Action type “M”. The Guidance should also clarify that the ACER code of each group member should be the code valid at the time of submission.
In our view, it would not be consistent with the overall reporting logic to require the resubmission of a report solely because the ACER code of one market participant within the group has changed, whether such change occurs before or during the reporting window for the relevant quarter.

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

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

Feedback on Annex I

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

With reference to our comments on Data Field (10) and Section 3.2 above, we note that, in this case, the value “0” (none) should be reported only where the relevant position is balanced. By contrast, where the relevant contract type or scenario does not occur, the field should be left blank.

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

We suggest that, in this example, the relevant distinction should be drawn exclusively on the basis of whether counterparty B qualifies as a market participant.

Feedback on examples - Case 8

Additional feedback

Please provide any additional feedback related to proposed reporting guidance under Exposure Reporting or other elements not included in the survey. You may upload support materials.

Considering the complexity of the framework and the significant technical developments required for its implementation, the transition period and the first application of the new requirements in Q4 2027 are likely to be particularly challenging for both RRMs and market participants.
In this context, it will be important for the Agency to maintain an open and responsive communication channel, enabling the timely resolution of technical questions and the rapid provision of feedback on implementation-related issues. At the same time, during the initial implementation phase, we would welcome confirmation that reports may still be considered submitted on time where any delay is attributable to the time required to receive feedback from ACER/CSD.

Please upload your file(s) using the following filename format: [Name of the organisation you represent] _REMITExposure_v2

End of the survey

Contact

remit.consultations@acer.europa.eu