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ACER
European Union Agency for the Cooperation of Energy Regulators

ACER consultation: Revision of REMIT reporting (Table 1) - 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

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

- [ ] Electricity
- [x] Natural gas

- [ ] Not applicable

* Please specify the country of registration:

- (x) EU-27
- ( ) Other country

* EU-27 member states:

- ( ) AT - Austria
- (x) BE - Belgium
- ( ) BG - Bulgaria
- ( ) HR - Croatia
- ( ) CY - Cyprus
- ( ) CZ - Czechia
- ( ) DK - Denmark
- ( ) EE - Estonia
- ( ) FI - Finland
- ( ) FR - France
- ( ) DE - Germany
- ( ) EL - Greece
- ( ) HU - Hungary
- ( ) IE - Ireland
- ( ) IT - Italy
- ( ) LV - Latvia
- ( ) LT - Lithuania
- ( ) LU - Luxembourg
- ( ) MT - Malta
- ( ) NL - Netherlands
- ( ) PL - Poland
- ( ) PT - Portugal
- ( ) RO - Romania
- ( ) SK - Slovak Republic
- ( ) SI - Slovenia
- ( ) ES - Spain
- ( ) SE - 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 TRUM (v8.0)
- Draft Annex I (lifecycle events)
- Draft Annex II (examples of transaction reporting)

Survey sections:

1. Chapter 2 on Supply contracts to be reported on a continuous basis (new)
2. Chapter 6.1 on Parties to the contract
3. Chapter 6.2 on Order details
4. Chapter 6.3 on Contract details
5. Chapter 6.4 on Transaction details
6. Chapter 6.6 on Optionality details
7. Chapter 6.7 on Delivery profile
8. Chapter 6.8 on Lifecycle information (Annex I to the TRUM)
9. Annex II to the TRUM (examples reported through Table 1)
10. 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 TRUM (v8.0) - DRAFT v2

ACER_REMIT_TRUM_v8.0_DRAFT_v2_for_consultation.docx

Draft Annex I (lifecycle events) - DRAFT v2

ACER_REMIT_TRUM_ANNEX_I_v1.0_DRAFT_v2_for_consultation.docx

Draft Annex II (examples of transaction reporting) - DRAFT v2

ACER_REMIT_TRUM_Annex_II_v6.0_DRAFT_v2_for_consultation.zip

Chapter 2 of the revised TRUM

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

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

Chapter 2.1 Reporting scenarios related to standard contracts

Chapter 2.1.1 Ways of trading

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

Chapter 2.1.2 Trading arrangements

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

Chapter 2.1.3 Type of products and contracts

- [ ] 2.1.3.1 Trade at settlement
- [x] 2.1.3.2 Local flexibility products
- [ ] 2.1.3.3 Gas within-day contracts

2.1.3.2 Local flexibility products

> e understand that further alignment is foreseen by ACER with relevant stakeholders to ensure that ensure that a more comprehensive and descriptive guidance can be set out in the context of local flexibility products.
> We wish to restate our previous statement, that in our opinion when TSOs are facilitating competition among multiple market parties to meet the TSO's operational needs, such platforms, whether operated directly by TSOs or by third parties, should be considered solely as the parties responsible for transaction reporting. This principle should be made explicit more broadly and applied consistently to other TSO services and activities, such as balancing markets.

Chapter 6.1 Parties to the contract

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

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

Data Field (1) ID of the market participant

Reporting guidance:

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

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

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

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Data field (3) Liquidity provision activity

Reporting guidance:

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

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

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

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Data Field (4) ID of the trader

Reporting guidance:

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

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

- ( ) Agree
- (x) Do not agree
- ( ) No opinion

* If not agreed, please provide an alternative:

We call for clarification on the management of this field in the context of delegated reporting. The reporting party does not have access to the Trader ID of the delegating counterparty, and current market practice often relies on the use of a default value or company identifier instead.

We therefore request ACER's confirmation that counterparties are not expected to exchange Trader IDs for each transaction, as such a requirement would create significant operational challenges and incremental costs.

To ensure proportionality and consistent reporting data, we encourage limiting the mandatory reporting of this field to transactions executed on an OMP, where the relevant information is typically accessible.

Our suggestion is to classify this field as Mandatory with conditionality (M*).

We wish to draw attention to the operational complexities that may arise from the combined application of the two proposed requirements, particularly with regard to the data flow between the MP and the OMP necessary for reporting to ACER. In addition to reaffirming our disagreement with ACER's proposal, we consider it important to recognise that responsibility for monitoring an algorithm may rest with a shift-based operational team and not with a single person. If ACER nevertheless decides to maintain the dual requirement, an appropriate solution would be to allow a fixed identifier referring to the relevant monitoring team in place of the trader ID of an individual.

Data Field (5) Algorithm ID

Reporting guidance:

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

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

* If not agreed, please provide an alternative:

Where a transaction was originally concluded on an OMP through an algorithm, we would benefit from clarification on the envisaged reporting method of this field where the trade subsequently needs to be novated OTC due to a change in the ACER code of one of the counterparties.

On that basis, we propose that ACER seek to limit the scope and complexity of the additional reporting rules and ensure that OMPs establish appropriate and standardised processes for the allocation and communication of Algorithm IDs. In particular, OMPs should manage Algorithm IDs in a manner consistent, as far as possible, with their existing approach to Trade ID generation, to ensure that ensure a high level of standardisation and minimise the reporting burden on market parties.

We expressly welcome that the withdrawal of the previously proposed requirements concerning the composition of the Algorithm ID as it was previously formulated has been withdrawn. At the same time, ACER should pursue a pragmatic and proportionate approach by promoting harmonised OMP procedures for the creation and communication of Algorithm IDs. Alignment with established Trade ID governance would facilitate standardisation and reduce unnecessary implementation effort.

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

Reporting guidance:

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

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

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

Data Field (10) Beneficiary ID

Reporting guidance:

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

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

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

Reporting guidance:

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

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

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

Chapter 6.2 Order details

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

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

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

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

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

Data Field (16) Order type

Reporting guidance:

Please provide feedback on the proposed reporting requirements on the population of the data field.

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

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

Data Field (18) Order status

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

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

Data Field (21) Undisclosed volume

Lifecycle reporting guidance (Annex I to the TRUM):

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

* Do you agree with the proposed lifecycle reporting requirements for the Undisclosed volume field?
- ○ Agree
- ○ Do not agree
- ◉ No opinion

Chapter 6.3 Contract details

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

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

Data Field (25) Contract type

Reporting guidance:

Please provide feedback on the revised description of the reporting guidance available under Data Field (25).

* Do you agree with the proposed reporting guidance for the Contract type field?
- ○ Agree
- ○ Do not agree
- ◉ No opinion

Data fields related to fixing details:

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

- **Data Field (31) Fixing frequency**
- **Data Field (48) Index value**

Reporting guidance:

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

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

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

- ( ) Agree
- (•) Do not agree
- ( ) No opinion

* If not agreed, please provide an alternative:

As concerns Data Fields related to price

28 – fixing index types

We endorse the addition that fixing index type, source and frequency shall be applicable only in case the fixing index used in the contract is not publicly accessible. This information is typically accessible from index provider and/or institutional bodies.

All other fields:

We endorse the extension of Table 1 to fixed-quantity contracts with complex pricing formulas, but we noted in the text/different documents several inconsistencies. The proposal raises concerns the proposal to add a specific lifecycle event for this type of contracts once the value of all price components is known. Given that the relevant indices and reference prices are typically publicly accessible and, if needed, can be independently verified by ACER, this further reporting obligation would appear to create operational challenges without providing a clear enhancement to market transparency.

With respect to Field (45) Price the request of a lifecycle event communication is contradictory the statement that “If the contract price is determined by a pricing index or a reference price indicated in data field (27), that field is typically not applicable.”

Further to that, different fields expected to be filled in for the same type of contract in table 1 (as example 1 vs example 2 in TRUM Data Field (27) Fixing index or reference price) could create additional complexity for smaller MPs that manage manually the data reporting and could - at the end - deteriorate data quality.

We therefore suggest ACER to reconsider this requirement and to provide additional clarification on the rationale behind it, to ensure that ensure greater consistency, proportionality and efficiency across the overall reporting framework.

Should the Agency nevertheless decide to maintain the suggested approach, we strongly recommend using a distinction consistent with the overall TRUM document. In particular distinguishing between contracts priced through a simple formula, such as k + Index, and contracts based on more complex formulas involving multiple indices, such as k + i1 + i2… appears consistent with the examples set out under Data Field (27) of Table 1 (which indicate that a Modify event is required only where the pricing formula includes more than one index) but seems inconsistent with the data reporting distinction between simple indexes (such as Index or k± Index) and complex price formula (e.g. k + i1 + i2…, k* Index, or k+i1 + (x*i2)…).

To avoid ambiguity and ensure a harmonised language of the reporting rules and distinctions across the TRUM.

Regarding filed Organized Market Place ID:

The reference set out to LNG market data in the field description appears not to be consistent with the most recent version of the Annex on LNG. We would kindly ask ACER to review and align this reference accordingly.

Data Field (32) Settlement method

Reporting guidance:

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

Revised list of accepted values:

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

* Do you agree with the proposed reporting guidance for the Settlement method field?
  - Agree
  - Do not agree
  - No opinion (selected)

Data Field (34) Type of trading venue

Reporting guidance:

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

Revised list of accepted values:

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

* Do you agree with the proposed reporting guidance for field Type of trading venue?
  - Agree
  - Do not agree
  - No opinion (selected)

Chapter 6.4 Transaction details

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

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

Data Field (37) Transaction timestamp

Reporting guidance:

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

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

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

Data Field (41) Voice-brokered

Reporting guidance:

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

Revised list of accepted values:

- On-Screen
- Off-Screen
- No

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

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

Data Field (42) Post-trade event

Reporting guidance:

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

- Give-up
- Take-up

* Do you agree with the proposed reporting guidance for field Post-trade event?
  - Agree
  - Do not agree
  - No opinion

Data Field (43) Transaction type

Reporting guidance:

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

- CL = Cleared
- BM = Batch matching
- WT = Wash trade
- PPA = Power Purchase Agreement
- EFP = Exchange for Physical
- EFS = Exchange for Swaps

* Do you agree with the proposed reporting guidance for field Transaction type?
  - Agree
  - Do not agree
  - No opinion

* If not agreed, please provide an alternative:

In Section 2.2.2 on PPAs, and in particular, in the examples of PPA-related contracts and executions included in Annex II, there would appear to be an inconsistency with the proposal under Table 1 to move the values applicable to PPAs from Field (25) “Contract Type” to Field (43) “Transaction Type”.

This point is especially important for the reporting of PPA-related executions under Table 2, where the examples set out do not appear to fully reflect the proposed reallocation of these values between the two fields in Table 1. For instance, in Example 3.02(E), the Contract Type field is populated with the value FW_PPA.

We would therefore welcome enhanced clarity and further detail on the intended reporting approach, including additional examples showing how PPA executions should be reported under the envisaged framework. Such clarification would support a consistent understanding and application of the reporting rules by market parties. We would expect the indication that a contract is a PPA to be reported only at contract reporting level, for contracts originally reported under Table 2, and that Market Participant shouldn’t be required again to indicate the status of PPA also for the executions.

Equally, we would benefit from confirmation that baseload PPAs may also be reported through Table 1, set out that the data fields used to identify a contract as a PPA are completed consistently with the baseload volume profile of the transaction.

More typically, regarding the use of different fields to report the same PPA-related information across Tables 1 and 2 (i.e. Transaction Type and Contract Type data fields) introduces an avoidable risk of reporting errors. We accordingly encourage harmonising the relevant fields and coding logic across both tables.

We once again recommend adopting 'Cross Trade' as the overarching term and referring to 'Wash Trade' only by way of explanation. Using neutral terminology would help prevent the transaction type from being automatically associated with abusive or manipulative trading practices.

Data Field (44) Bidding ID

Reporting guidance:

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

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

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Data Field (45) Price
Data Field (46) Price formula
Data Field (49) Price currency and unit

Reporting guidance:

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

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

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

* If not agreed, please provide an alternative:

To ensure consistency across the reporting framework, we propose removing the references to LNG from the description of this field. LNG reporting is covered separately through the dedicated Tab1LNG guidance and documentation. Eliminating these references would improve clarity and avoid potential uncertainty regarding the scope of the reporting obligations.

We endorse the extension of Table 1 to fixed-quantity contracts with complex pricing formulas, but we noted in the text/different documents several inconsistencies. The proposal raises concerns the proposal to add a specific lifecycle event for this type of contracts once the value of all price components is known. Given that the relevant indices and reference prices are typically publicly accessible and, if needed, can be independently verified by ACER, this further reporting obligation would appear to create operational challenges without providing a clear enhancement to market transparency.

With respect to Field (45) Price the request of a lifecycle event communication is contradictory the statement that “If the contract price is determined by a pricing index or a reference price indicated in data field (27), that field is typically not applicable.”

Further to that, different fields expected to be filled in for the same type of contract in table 1 (as example 1 vs example 2 in TRUM Data Field (27) Fixing index or reference price) could create additional complexity for smaller MPs that manage manually the data reporting and could - at the end - deteriorate data quality.

We therefore suggest ACER to reconsider this requirement and to provide additional clarification on the rationale behind it, to ensure that ensure greater consistency, proportionality and efficiency across the overall reporting framework.

Should the Agency nevertheless decide to maintain the suggested approach, we strongly recommend using a distinction consistent with the overall TRUM document. In particular distinguishing between contracts priced through a simple formula, such as k + Index, and contracts based on more complex formulas involving multiple indices, such as k + i1 + i2… appears consistent with the examples set out under Data Field (27) of Table 1 (which indicate that a Modify event is required only where the pricing formula includes more than one index) but seems inconsistent with the data reporting distinction between simple indexes (such as Index or k± Index) and complex price formula (e.g. k + i1 + i2…, k* Index, or k+i1 + (x*i2)…).

To avoid ambiguity and ensure a harmonised language of the reporting rules and distinctions across the TRUM.

Data Field (53) Quantity/volume
Data Field (54) Total notional contract quantity

Lifecycle reporting guidance:

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

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

- ( ) Agree
- ( ) Do not agree
- (•) No opinion

Chapter 6.6 Optionality details

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

- Data field 69: Option style
- Data field 70: Option type
- Data field 71: Option exercise date or period
- Data field 72: Option exercise frequency
- Data field 73: Option strike price
- Data field 74: Minimum/Maximum quantity
- Data field 75: Minimum/Maximum total notional contract quantity

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

Reporting guidance:

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

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

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

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

- ( ) Agree
- ( )

Do not agree
No opinion

* Do you agree with the proposed reporting guidance for field Option type?
  - Agree
  - Do not agree
  - No opinion

* Do you agree with the proposed reporting guidance for field Option exercise date or period?
  - Agree
  - Do not agree
  - No opinion

* Do you agree with the proposed reporting guidance for field Option exercise frequency?
  - Agree
  - Do not agree
  - No opinion

* Do you agree with the proposed reporting guidance for field Option strike price?
  - Agree
  - Do not agree
  - No opinion

Data Field (74) Minimum/Maximum quantity
Data Field (75) Minimum/Maximum total notional contract quantity

Reporting guidance:

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

* Do you agree with the proposed reporting guidance for fields Minimum/Maximum quantity and Minimum /Maximum total notional contract quantity?
  - Agree
  - Do not agree
  - No opinion

Chapter 6.7 Delivery profile

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

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

Data Field (78) Delivery point or zone

Reporting guidance:

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

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

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Data Field (81) Duration

Reporting guidance:

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

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

- ( ) Agree
- (x) Do not agree
- ( ) No opinion

* If not agreed, please provide an alternative:

We would like to draw attention to an inaccuracy in the description of W (week) in the list of accepted values. To the definition “Week: The contract delivers in one day or over several days, but the delivery period is less than one month,” we believe it would be appropriate to add that the delivery period should be greater than or equal to one week; otherwise, it conflicts with the definition of D(DAY).

Data Field (82) Number of periods

Reporting guidance:

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

* Do you agree with the proposed reporting guidance for field Number of periods?
- ( ) Agree
- (•) Do not agree
- ( ) No opinion

* If not agreed, please provide an alternative:

With respect to the transaction lifecycle event: in line with our general reservation regarding the necessity of the NoP field, we request that it be clarified that the NoP field should be modified “only” in the event of early termination and that this does not apply, for example, to lifecycle events related to corporate novations or to changes that occur during the term of the contract.

Additionally, we specifically request that the field not be updated if early termination occurs before the start of delivery.

Data Field (83) Load type

Reporting guidance:

* Do you agree with the proposed changes in the reporting guidance for field Load type?
- ( ) Agree
- ( ) Do not agree
- (•) No opinion

Data Field (84) Load delivery intervals

Reporting guidance:

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

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

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

- Agree
- (x) Do not agree
- No opinion

* If not agreed, please provide an alternative:

With respect to Load delivery intervals field (84), we would like to draw attention to that the prescription to leave blank data fields (85) and (87) if the price and/or quantity are the same for each delivery interval should refer not also to cases as reported in data fields (45) and (53) but also to fields (27) and (46), since also the Price Formula could be the same for all delivery intervals.

Data field (87) Price/time interval quantity

Reporting guidance:

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

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

- Agree
- Do not agree
- (x) No opinion

Chapter 6.8 Lifecycle information

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

Data Field (88) Action type

Reporting guidance:

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

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

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

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

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

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

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

* If not agreed, please provide an alternative:

See document attached

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

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

Annex II to the TRUM

This section focuses on the examples provided in Annex II to the TRUM. These aim to provide reporting guidance for specific use case scenarios. Please provide any feedback on the Annex II examples reported through Table 1 you may have.

Annex II to the TRUM (examples reported through Table 1)

- ☐ 2.1.1 Auction markets
- ☐ 2.1.2 Continuous markets (on exchange OMPs)
- ☐ 2.1.3 Continuous markets (on broker-type OMPs)
- ☐ 2.1.4 Non-standard bilateral contracts reportable via Table 1
- ☐ 2.2 Executions reportable via Table 1 of non-standard contracts

Additional feedback

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

See document in Annex

Please upload your files(s) with the following naming convention: "[Name of the organisation you represent]_REMITTable1_v2".

b477b6a9-eacc-49e5-ab9c-e3d739ec1354/Additional_feedback_from_IOGP_Europe.pdf

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End of survey

Contact

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