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ACER
European Union Agency for the Cooperation of Energy Regulators

ACER consultation: Revision of REMIT reporting (Table 1 LNG and Annex III to the TRUM) - 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

- [ ] Natural gas
- [x] Not applicable

* Please specify the country of registration:
- (•) EU-27
- ( ) Other country

* EU-27:
- ( ) Austria
- (•) Belgium
- ( ) Bulgaria
- ( ) Croatia
- ( ) Cyprus
- ( ) Czechia
- ( ) Denmark
- ( ) Estonia
- ( ) Finland
- ( ) France
- ( ) Germany
- ( ) Greece
- ( ) Hungary
- ( ) Ireland
- ( ) Italy
- ( ) Latvia
- ( ) Lithuania
- ( ) Luxembourg
- ( ) Malta
- ( ) Netherlands
- ( ) Poland
- ( ) Portugal
- ( ) Romania
- ( ) Slovak Republic
- ( ) Slovenia
- ( ) Spain
- ( ) Sweden

Confidentiality and data protection:

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

Introduction to the survey

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 Annex III to the TRUM on LNG market and trade data

Survey sections:

1. Chapter 2 on Reporting obligation
2. Chapter 3 on Type of LNG market data
3. Chapter 4.1 on Parties to the contract
4. Chapter 4.3 on Contract details
5. Chapter 4.4 on Transaction details
6. Chapter 4.5 on Details of LNG market and trade data
7. Chapter 4.6 on Optionality details
8. Chapter 4.7 on Delivery profile
9. Chapter 4.8 on Lifecycle information
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 Annex III to the TRUM on LNG market and trade data (DRAFT v2)

ACER_REMIT_TRUM_ANNEX_III_v1.0_DRAFT_v2_for_consultation.docx

Chapter 2 Reporting obligation

Chapter 2 aims to describe the reporting obligations related to LNG market data.

Respondents are invited to provide feedback on the proposed guidance on the definition of LNG market data and the related reporting obligation with regard to:

- Lifecycle reporting
- Timing of reporting
- Reporting channel and format

Chapter 2 Reporting obligation

- [ ] 2.1. LNG market data
- [x] 2.2. Lifecycle reporting of the LNG market data
- [x] 2.3. Timing of reporting
- [ ] 2.4. Reporting channel and format

2.2 Lifecycle reporting of the LNG market data

With respect to this section, we would suggest clarifying that volume variations falling within the applicable operational tolerance should not give rise to a reportable lifecycle event requiring submission with Action Type “M”. In our view, such adjustments should be regarded as ordinary operational deviations rather than lifecycle modifications.

2.3 Timing of reporting

We recognize that the 'as close to real-time as technologically possible' restriction originates from the fundamental legislative framework; we would nonetheless propose that the reporting directives make clear that, for operations occurring during evening hours, weekend periods and holidays as per the ACER timetable, real time ought to be interpreted as by 12:00 CET of the following business day. We would also ask ACER to ensure that its public holiday calendar is consistently published by September of the preceding year. This would allow reporting parties to adequately anticipate non-business days and align their internal systems and operational reporting arrangements accordingly.

Considering that ACER lacks round-the-clock dedicated personnel for this operation, requiring data delivery beyond conventional working periods — spanning nighttime hours, weekend days, and statutory holidays — would impose an excessive and unbalanced obligation on reporting entities.

In addition, addressing the appreciated suggestion to avoid requiring the reporting of confirmed purchase requests yet solely the corresponding business transactions, our organization's interpretation suggests that this exception applies exclusively in cases where the transaction is settled during the same business day. At contrary, the reporting of the order – even if subsequently accepted – would not be consider excessive information disclosure if acceptance by the opposite party occurs within subsequent working days.

Chapter 3 Type of LNG market data

Chapter 3 of Annex III aims to provide guidance on the type of transactions to be considered as LNG market data and the related reporting requirements.

Respondents are invited to provide feedback on the proposed guidance with regard to the type of contracts typical for LNG trading, the reporting requirements related to multiple cargo transactions, the type of transactions excluded from the reporting, the scope of reportable LNG bids and offers, definitions of the delivery terms, and the described reporting scenarios.

Chapter 3 Type of LNG market data

- [x] 3.1. Type of contracts typical for LNG trading
- [ ] 3.2. How to report multiple cargo transactions
- [x] 3.3. Type of transactions excluded from the reporting of LNG market data
- [ ] 3.4. Scope of reportable LNG bids and offers
- [ ] 3.5. Delivery terms definition: DES vs FOB
- [x] 3.6. Reporting scenarios

3.1 Type of contracts typical for LNG trading

PORTFOLIO TYPE CONTRACTS

While acknowledging the Agency's mandate to receive updated transaction data, we firmly reject any requirement to submit lifecycle-event reports for quantity variations falling within operational tolerances.

It must be stated unequivocally that operational tolerances in the LNG supply chain are strictly dictated by unavoidable physical and technical constraints—such as vessel tank volume limits, boil-off rates, and thermodynamic variations during loading and regasification. Under no circumstances do these margins represent commercial decisions or discretionary business choices by the market participants.

Extending lifecycle reporting obligations to these purely operational fluctuations would misapply the core purpose of transaction reporting, subjecting market participants to a severe and unjustified compliance burden with zero incremental supervisory value.

With reference to Sections 3.1.3 (portfolio-type contracts) and 3.1.4 (cargo nominations under portfolio-type contracts), as well as the related callout boxes and "the lifecycle event description with Action type M within T+10 working days from when the final price and/or cargo volume become known" (page 12), we reiterate our position from previous consultation rounds.

The cargo nomination or delivery program date does not necessarily coincide with the moment when the price and volume are known and fixed, which in most cases occurs only upon invoicing. To maintain consistency with transaction reporting requirements, we consider it correct to align the timing of execution with the moment of invoicing, as this represents the actual point when both price and quantity are known and finalized.

We would also ask for clarification on why the entire portfolio contract must be reported once an EU delivery is agreed, thereby triggering Table 2 reporting (T+10), rather than only the EU-specific delivery agreement. The reference to the 'EIC code of the agreed EU delivery terminal' in the Table 2 report appears consistent with the view that only the delivery agreement(s) relating to the EU market should be reportable, rather than the portfolio contract in its entirety. It also remains unclear how optionality embedded in the original contract should be reported where it is not linked to EU deliveries. Our understanding is that the geographical application of REMIT data reporting is for deliveries within EU, therefore we would appreciate a clarification within the text to limit the reporting of the portfolio contracts only to potential deliveries to EU.

As already requested in the first round, we would ask for confirmation of how the framework accommodates a scenario where a cargo initially confirmed for EU delivery is subsequently diverted outside the EU.

Furthermore, referring to Section 3.1.2, about "quantity information" for spot-type trades, understanding the need to receive updated values, consistently with the current practices, we discourage the request of life cycle events reporting in case of quantities changes within the operational tolerance. In case the Agency supports our understanding, we suggest better clarifying it within the text.

CARGO NOMINATIONS UNDER A PORTFOLIO-TYPE CONTRACTS

Consistently with the changes made on the document for this second round of consultation, we would ask that the blue box on page 12, which cannot be commented on directly, be updated to reflect the cargo-nomination-versus-execution concept, and that, in the purple box, it be specified that the Cancel action type should apply only to cargo diversions outside the EU.

3.3 Type of transactions excluded from the reporting of LNG market data

we would like to point out that the portfolio-type contract note has not yet been corrected and should reference cargo nominations instead of executions.

3.6 Reporting scenarios

We reiterate the position already expressed during the previous consultation round that, with respect to operational tolerances in the LNG market, the proposed approach does not appear fully aligned with prevailing market practice, where operational tolerances of up to approximately 99% of the cargo volume are commonly observed.

With regard to Scenario 2 — concerning a spot-type transaction for a single cargo where the delivery point is changed from an EU terminal to a non-EU terminal — we note the statement that the transaction is “not reportable under REMIT”. We would respectfully suggest reconsidering this wording. Where the loading port is located in the EU, the transaction should remain reportable under REMIT for standard transaction-reporting purposes, even if it does not qualify as reportable LNG market data. The same consideration applies to Scenario 3, concerning a portfolio contract for multiple cargoes with variable delivery. In particular, the statement that “the original portfolio-type contract is not considered reportable under REMIT since no EU delivery is specified” should also be revisited where the relevant loading port is situated within the EU.

We would further observe that the wording “when the decision to deliver a cargo to the EU is made” should not apply in circumstances where the loading port is already located within the EU. In addition, we would welcome confirmation that the phrase “the same requirements shall apply in case any further deliveries agreed to be delivered in the EU” is not intended to require the submission of an additional Table 2 report.

Finally, we would appreciate further clarification on how optionality and flexibility embedded in the original portfolio contract should be reported where such features are not connected to EU deliveries. It remains unclear why commercial optionalities that are unrelated to the EU market should fall within the reporting scope merely because a specific delivery under the portfolio contract is subsequently directed to the EU. As already noted in Section 3.1, uncertainty remains as to the treatment of optionality included in the original portfolio contract where such optionality has no link to EU deliveries. In our understanding, the geographical scope of REMIT data reporting is limited to deliveries within the EU. On this basis, we would welcome an explicit clarification in the guidance that reporting obligations for portfolio contracts should be limited to actual or potential deliveries into the EU.

Chapter 4.1 Parties to the contract

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

- Data Field (1) ID of the market participant
- Data Field (4) ID of the trader
- Data Field (6) ID of the other market participant (counterparty)
- Data Field (10) Beneficiary ID
- Data Field (12) Trading capacity of the market participant or counterparty in field 1
- Data Field (13) Buy/sell indicator

Data Field (1) ID of the market participant

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the ID of the market participant?
  - ○ Agree
  - ○ Do not agree
  - ◉ No opinion

Data Field (4) ID of the trader

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the ID of the trader?
  - ○ Agree
  - ○ Do not agree
  - ◉ No opinion

Data Field (6) ID of the other market participant (counterparty)

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the ID of the other market participant (counterparty)?

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

Data Field (10) Beneficiary ID

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

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

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

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Trading capacity of the market participant or counterparty in field 1?

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

Data Field (13) Buy/sell indicator

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Do you agree with the proposed guidance for the reporting of the Buy/sell indicator?

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

Chapter 4.3 Contract details

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

- Data Field (24) Contract name
- Data Field (25) Contract type
- Data Field (27) Fixing index or reference price
- Data Field (28) Fixing index types
- Data Field (29) Fixing index sources
- Data Field (30) Index fixing interval
- Data Field (31) Fixing frequency
- Data Field (33) Organised marketplace ID/OTC

Data Field (24) Contract name

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Contract name?

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

* If not agreed, please provide an alternative:

> P24 should be a closed picklist. Although the technical specification defines it as an alphanumeric field, the business rules limit accepted values to only two predefined options. This is inconsistent with the equivalent field design in Table 1 and unnecessarily increases the risk of reporting errors.
> OMP transactions appear to sit outside this table's LNG market data reporting scope, and we ask that the field description be revised to match.

Data Field (25) Contract type

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to propose additional type of contracts to be included in this field but not covered under the currently proposed list of values.

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

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

Data Field (27) Fixing index or reference price

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Fixing index or reference price?

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

Data Field (28) Fixing index types

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM. The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

Respondents are invited to provide use cases when the value ‘OT’ would be applicable. Otherwise it may be removed from the list of accepted values upon publication.

* Do you agree with the proposed guidance for the reporting of the Fixing index types?

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

Data Field (29) Fixing index sources

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Fixing index sources?

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

Data Field (30) Index fixing interval

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Index fixing interval?

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

Data Field (31) Fixing frequency

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Fixing frequency?

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

Data Field (33) Organised marketplace ID/OTC

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Organised marketplace ID/OTC?

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

* If not agreed, please provide an alternative:

we restate, as under Data Field (24), that OMP transactions do not appear covered by LNG market data reporting in this table, and suggests the field description be updated to reflect this.

We also welcome the added 'XBIL' clarification and suggest inserting the same note in field 24 for consistency and easier reading.

Chapter 4.4 Transaction details

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

- Data Field (37) Transaction timestamp
- Data Field (38) Unique transaction ID
- Data Field (39) Linked transaction ID
- Data Field (45) Price
- Data Field (46) Price formula
- Data Field (47) Price in EUR/MWh

- Data Field (48) Index value
- Data Field (49) Price currency and unit
- Data Field (50) Notional amount
- Data Field (51) Notional amount in EUR
- Data Field (52) Notional currency
- Data Field (54) Total notional contract quantity
- Data Field (55) Total notional contract quantity in MWh
- Data Field (56) Quantity unit for field 53 and 54
- Data Field (57) Termination date

Data Field (37) Transaction timestamp

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

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

* If not agreed, please provide an alternative:

we note that the blue box on page 31 continues to use the term ‘executions’ where ‘cargo nominations’ is intended.

Data Field (38) Unique transaction ID

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Unique transaction ID?

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

* If not agreed, please provide an alternative:

With respect to bilateral spot transactions, we understand that a matching UTI should be submitted as a lifecycle update to the LNG market data already reported, using Action Type “M”. In this regard, we would welcome further clarification on how the relevant validation rules will apply to this table, considering that the UTI update would necessarily be reported through Action Type “M”.

In addition, we have identified an inconsistency between the Table 1 and Table 1 LNG schemas, as the subfield “Matching UTI” appears to be used instead of “Additional UTI Info”. Harmonised field names and definitions across standard reporting templates are essential to support a consistent implementation of the reporting framework. The use of different labels for equivalent data elements may increase implementation costs and lead to divergent data structures and reporting practices. We therefore recommend aligning the relevant field definitions and naming conventions across all schemas, in order to promote data consistency, operational efficiency and a uniform approach to reporting

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Data Field (39) Linked transaction ID

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are also invited to provide feedback on cases when the LNG market data record related to an Execution (reported real time) would be reported earlier than the linked non-standard contract reported in T+10 in Table 2.

* Do you agree with the proposed guidance for the reporting of the Linked transaction ID?

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

* If not agreed, please provide an alternative:

Regarding the requirement to report cancelled cargo nominations under action type C with the effective termination date, we recommend that ACER replaces the term ‘termination date’ with ‘diversion decision date’ to improve clarity.

Data Field (45) Price

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Price?

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

Data Field (46) Price formula

Reporting guidance:

Respondents are invited to provide feedback on the proposed price formula structure covering Data Fields 27, 28, 29, 30, 31, 46 and 48.

* Do you agree with the proposed guidance for the reporting of the Price formula?

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

* If not agreed, please provide an alternative:

> We understand that LNG market data may only be reported using the LNG Table 1 format. On this basis, we would welcome clarification that, once LNG market data has been submitted under LNG Table 1, no separate REMIT Table 2 contract should be required under the standard REMIT reporting framework. Any subsequent updates or additional information, including invoice-based executions once price and quantity have been finalised, should instead be reported as amendments to the LNG Table 1 transaction originally submitted.
>
> With respect to the components described under this field, we consider that only the free-text price formula should be mandatory. The remaining components should be treated as optional supplementary information intended to facilitate a more structured presentation of the price formula. This approach should also be consistently reflected in the applicable validation rules.

Data Field (47) Price in EUR/MWh

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Price in EUR/MWh?

- Agree

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

Data Field (48) Index value

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Index value?

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

Data Field (49) Price currency and unit

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM. The proposed requirements shall be consulted together with those described under Data Field (45) Price.

Respondents are invited to propose which other currency and unit shall be added to the list.

* Do you agree with the proposed guidance for the reporting of the Price currency and unit?

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

Data Field (50) Notional amount

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (45) Price.

* Do you agree with the proposed guidance for the reporting of the Notional amount?

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

Data Field (51) Notional amount in EUR

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Notional amount in EUR?

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

Data Field (52) Notional currency

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to propose which other currency shall be added to the list.

* Do you agree with the proposed guidance for the reporting of the Notional currency?

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

Data Field (54) Total notional contract quantity

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Total notional contract quantity?

- Agree
- Do not agree
- No opinion

Data Field (55) Total notional contract quantity in MWh

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Total notional contract quantity in MWh?

- Agree
- Do not agree
- No opinion

Data Field (56) Quantity unit for field 53 and 54

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to indicate in their feedback which other unit shall be added to the list.

* Do you agree with the proposed guidance for the reporting of the Quantity unit for field 53 and 54?

- Agree
- Do not agree
- No opinion

Data Field (57) Termination date

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Termination date?

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

Chapter 4.5 Details of LNG market and trade data

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

- Data Field (58) Type of LNG market data
- Data Field (59) Annual delivery program
- Data Field (60) Cargo swap
- Data Field (61) Event type
- Data Field (62) Loading facility
- Data Field (63) Vessel identifier
- Data Field (64) Delivery terms
- Data Field (65) Portfolio contract price formula
- Data Field (66) Special arrangement
- Data Field (67) Reporter's information
- Data Field (68) Business contact details

Data Field (58) Type of LNG market data

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Type of LNG market data?

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

Data Field (59) Annual delivery program

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Annual delivery program?

- Agree
- Do not agree
- No opinion

Data Field (60) Cargo swap

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Cargo swap?

- Agree
- Do not agree
- No opinion

Data Field (61) Event type

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to indicate in their feedback the additional event types not included in the list but deemed relevant for the reporting reflecting the real case scenarios.

* Do you agree with the proposed guidance for the reporting of the Event type?

- Agree
- Do not agree
- No opinion

Data Field (62) Loading facility

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to propose international industry standards as examples for the identification of loading terminals to be adopted by the reporting guidance.

* Do you agree with the proposed guidance for the reporting of the Loading facility?
- ○ Agree
- ○ Do not agree
- ◉ No opinion

Data Field (63) Vessel identifier

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Vessel identifier?
- ○ Agree
- ○ Don't agree
- ◉ No opinion

Data Field (64) Delivery terms

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to indicate in their feedback the additional delivery terms not included in the list but deemed relevant for the reporting reflecting real case scenarios.

* Do you agree with the proposed guidance for the reporting of the Delivery terms?
- ○ Agree
- ○ Do not agree

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

Data Field (65) Portfolio contract price formula

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Portfolio contract price formula?

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

Data Field (66) Special arrangement

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Special arrangement?

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

Data Field (67) Reporter's information

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Reporter's information?

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

Data Field (68) Business contact details

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Business contact details?

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

Chapter 4.6 Optionality details

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

- Data Field (75) Minimum/Maximum total notional contract quantity
- Data Field (76) Minimum/Maximum total notional contract quantity in MWh
- Data Field (77) Quantity unit for fields 75 and 76

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

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

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

Data Field (76) Minimum/Maximum total notional contract quantity in MWh

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Minimum/Maximum total notional contract quantity in MWh?

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

Data Field (77) Quantity unit for fields 75 and 76

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to indicate in their feedback which other unit shall be added to the list.

* Do you agree with the proposed guidance for the reporting of the Quantity unit for fields 75 and 76?

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

Delivery profile

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

- Data Field (78) Delivery point or zone
- Data Field (79) Delivery start date
- Data Field (80) Delivery end date

Data Field (78) Delivery point or zone

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Delivery point or zone?

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

Please explain (optional):

> we are grateful for the EAN code clarification and proposes amending the field descriptions in every place that reference appears.

Data Field (79) Delivery start date

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Delivery start date?

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

Data Field (80) Delivery end date

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Delivery end date?

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

Chapter 4.8 Lifecycle information

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

- Data Field (88) Action type

- Real time reporting (schema field)

Data Field (88) Action type

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Action type?

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

<realTimeReporting>

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Real time reporting?

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

Additional feedback

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

Given 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 expected to be particularly demanding for both RRMs and market participants.

Against this background, it will be important for the Agency to ensure an open, responsive and effective communication channel throughout the implementation phase, enabling the timely handling of technical queries and the prompt provision of feedback on implementation-related issues. In addition, during this phase, we would welcome confirmation that data submissions will be considered timely where any delay is attributable to the need to await feedback or clarification from ACER and/or the CSD before completing the relevant reporting.

on Chapter 4 Chapter 4 Reporting of LNG Market Data and its lifecycle in Table 1

We value the clarification given on cargo nominations and propose broadening reportable events to also capture bilateral spot-trade executions as well as cargo nominations under non-standard portfolio contracts formerly reported under Table 2.

We also seek confirmation regarding the Cardinality table for field ‘O’: whether the record shown against action type ‘N’ is a typographical slip, and whether the described optionality applies across all action types.

Please upload your file(s) using the following filename format [Name of the organisation you represent] _REMITTable1LNG_v2

End of survey

Contact

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