Contribution ID: b88e42db-5703-4f44-8653-f61ecbcd66b6
Date: 01/09/2026 17:15:42

ACER
European Union Agency for the Cooperation of Energy Regulators

ACER consultation: Revision of REMIT reporting (Table 2) - Second round

Fields marked with * are mandatory.

Respondent's 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 Marketplace (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

* Please specify the EU Member State:

- ( ) 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 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 3 on Supply contracts to be reported on a periodic basis (new)
3. Chapter 7.2 on Contract details
4. Chapter 7.3 on Fixing index details
5. Chapter 7.4 on Option details
6. Chapter 7.5 on Delivery profile
7. Chapter 7.6 on Lifecycle information (Annex I to the TRUM)
8. Annex II to the TRUM (examples reported through Table 2)
9. 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 2.2 describing the reporting requirements for non-standard contracts traded bilaterally by focusing on the key features of non-standard contracts and by addressing specific types of contracts such Power Purchase Agreements (PPAs) and LNG portfolio-type contracts. The draft revised guidance in this chapter is partially based on the currently available TRUM v7.0 and its Annexes, as well as the FAQs on REMIT transaction reporting (17th ed.).

Chapter 2.2. Reporting scenarios related to non-standard contracts

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

2.2.2. Power Purchase Agreements

n PPAs, particularly the Annex II examples concerning PPA contracts and related executions, appears not to be fully consistent with the Table 1 proposal to transfer the PPA-specific values from Field (25), “Contract Type”, to Field (43), “Transaction Type”.
This issue is especially relevant to the reporting of PPA executions in Table 2, since the examples do not seem to reflect completely the proposed redistribution of those values between the two Table 1 fields. By way of illustration, Example 3.02(E) reports FW_PPA in the Contract Type field.
Further explanation of the intended reporting treatment would therefore be valuable, together with supplementary examples illustrating how PPA executions should be required to be submitted under the proposed framework. This approach would promote a uniform interpretation and application of the requirements by market participants. For contracts initially reported in Table 2, the PPA designation should be required to, in our view, be provided only at contract level and should be required to not have to be repeated for each execution.
We would also appreciate confirmation that baseload PPAs can be reported in Table 1, provided that the fields identifying the transaction as a PPA are populated in a manner consistent with its baseload volume profile.
More broadly, requiring the same PPA information to be reported in different fields in Tables 1 and 2, namely Transaction Type and Contract Type, creates an avoidable risk of reporting inaccuracies. For this reason, we urge aligning the relevant fields and coding conventions across the two tables.

2.2.3. LNG Portfolio-type contracts

We emphasise again that the definition should cover cargoes whose final discharge destination is outside the EU whenever the relevant transaction occurs in Europe, for example a transfer of cargo ownership in EU waters or a reload at an EU terminal. Such transactions should be required to remain reportable under REMIT irrespective of the cargo’s ultimate discharge location.

Chapter 3 of the revised TRUM

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

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

Chapter 3 Supply contracts to be reported on a periodic basis

We acknowledge positively the possibility of reporting one execution every six months, which constitutes a useful simplification.

Nevertheless, the proposed granularity appears disproportionately complex, especially for contracts involving final customers that have limited or no potential to affect market dynamics.

The reporting model should be required to therefore reduce and streamline compliance obligations as far as possible. This is particularly important because these contracts are frequently reported through manual processes, creating an administrative burden that is excessive in view of their limited significance for market monitoring.

We consequently urge removing the supplementary level of granularity and keeping the reporting detail consistent with the six-monthly single-execution approach.

Chapter 7.2 Contract details

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

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

Data Field (12) Contract type

Reporting guidance:

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

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

- ○ Agree
- ◉ Do not agree

- No opinion

* If not agreed, please provide an alternative:

> We acknowledge positively the possibility of reporting one execution every six months, which constitutes a useful simplification.
>
> Nevertheless, the proposed granularity appears disproportionately complex, especially for contracts involving final customers that have limited or no potential to affect market dynamics.
>
> The reporting model should be required to therefore reduce and streamline compliance obligations as far as possible. This is particularly important because these contracts are frequently reported through manual processes, creating an administrative burden that is excessive in view of their limited significance for market monitoring.
>
> We consequently urge removing the supplementary level of granularity and keeping the reporting detail consistent with the six-monthly single-execution approach.

Data Field (14) Linked transaction ID

Reporting guidance:

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

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

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

Please explain (optional):

> The summary table setting out the expected representation of a formula should be required to remain general guidance for completing the field and should be required to not form part of the design or definition of Validation Rules. From a technical standpoint, validation rules cannot reliably be built on indicative, high-level principles.

Data Field (15) Type of generation asset

Reporting guidance:

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

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

- Agree
- Do not agree
- No opinion

* If not agreed, please provide an alternative:

To remain consistent with the terminology used in ACER guidance on exposure reporting, the text should be required to specify that market participants must provide their best estimate using the information available when the report is submitted. It should be required to also acknowledge that, where price or quantity is genuinely indeterminable, the estimate is necessarily indicative and the later availability of more precise data should be required to not, by itself, trigger lifecycle reporting.

Data Field (16) Underlying mechanisms

Reporting guidance:

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

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (16)?

- Agree
- Do not agree
- No opinion

* If not agreed, please provide an alternative:

Section 2.2.2 on PPAs, particularly the Annex II examples concerning PPA contracts and executions, does not appear fully aligned with the Table 1 proposal to move PPA-specific values from Field (25), “Contract Type”, to Field (43), “Transaction Type”.

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

Reporting guidance:

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

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

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

* If not agreed, please provide an alternative:

> This is particularly important for PPA executions reported under Table 2, because the examples do not seem to incorporate fully the proposed reassignment of values between the two Table 1 fields. For example, Example 3.02(E) uses FW_PPA in the Contract Type field.
>
> We therefore request clearer and more detailed guidance on the intended reporting method, supported by further examples of PPA executions under the proposed framework. This approach would facilitate consistent interpretation and implementation. Where the underlying contract was originally reported in Table 2, its PPA status should be required to be indicated at contract level only and should be required to not need to be restated for the executions.
>
> Confirmation would also be useful that baseload PPAs may be reported via Table 1 when the fields identifying the PPA are completed consistently with the transaction’s baseload volume profile.
>
> More generally, using different fields in Tables 1 and 2 to capture identical PPA information, specifically Transaction Type and Contract Type, introduces an unnecessary source of reporting errors. We urge harmonising both the fields and the associated coding logic.
>
> The Table 1 and Table 2 approach should be required to be revised to ensure consistent treatment of PPA information. Reporting the same element in different fields according to the table used can result in material errors; the relevant fields and codes should be required to therefore be standardised.

Data Field (18) Delivery terms

<u>Reporting guidance:</u>

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

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

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

Data Field (19) Price or price formula

Reporting guidance:

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

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

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

* If not agreed, please provide an alternative:

We agree with retaining the "OT" value. However, taking account of the feedback submitted in the first consultation round, market participants should be required to be allowed to use it for LNG transactions without first contacting ACER. Prior consultation would add avoidable operational work and may produce inconsistent reporting outcomes.

Data Field (20) Notional amount

Reporting guidance:

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

* Do you agree with the proposed reporting guidance for Data Field (20)?

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

* If not agreed, please provide an alternative:

We acknowledge positively ACER's decision to keep the "OT" value. In view of the comments received during the first consultation, its use for reporting LNG transactions should be required to not be conditional on advance contact with ACER, since this would impose unnecessary operational effort and could undermine consistency in reporting.

Data Field (21) Notional currency

Reporting guidance:

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

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

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

Data Field (22) Annual contracted volume

Reporting guidance:

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

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

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

Chapter 7.3 Fixing index details

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

- Data Field (36) Settlement method

Data Field (36) Settlement method

Reporting guidance:

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

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

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

Chapter 7.4 Option details

Reporting requirements:

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

Feedback on reporting option details (optional):

Chapter 7.5 Delivery profile

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

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

Data Field (49) Number of periods

Reporting guidance:

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

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

- Agree
- Do not agree

◉ No opinion

Data Field (50) Load type

Reporting guidance:

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

* Do you agree with the proposed cancellation of value 'OT' in Data Field (50)?
  - ○ Agree
  - ◉ Do not agree
  - ○ No opinion

* If not agreed, please provide an alternative:

> Given the complexity of the framework and the scale of the technical changes needed for implementation, both the transition period and the initial application of the new requirements in Q4 2027 are expected to be particularly demanding for RRMs and market participants.

Chapter 7.6 Lifecycle information

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

Data Field (51) Action type

Reporting guidance:

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

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

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

- [ ] Agree
- [ ] Do not agree
- [x] 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 non-standard contracts reported through Table 2 you may have.

2.2 Non-standard contracts to be reported in Table 2

N/A

Additional feedback

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

During this phase, the Agency should be required to maintain an accessible and responsive communication channel so that technical questions can be addressed promptly and implementation issues receive timely feedback. Reports should be required to also be treated as submitted on time where a delay results from awaiting a response from ACER or the CSD.

During this phase, the Agency should be required to maintain an accessible and responsive communication channel so that technical questions can be addressed promptly and implementation issues receive timely feedback. Reports should be required to also be treated as submitted on time where a delay results from awaiting a response from ACER or the CSD.

As a general observation, the guidance should be required to explain more clearly the cases in which “OT” is an admissible field value but market participants must seek ACER’s direction. The applicable procedure and communication channels should be required to be identified, and delays caused by obtaining that guidance should be required to be confirmed as not constituting a breach of the relevant reporting deadline.

Regarding the Beneficiary ID field: to achieve consistent reporting between counterparties, ACER should be required to state expressly that this field is required only when the reporting market participant acts as agent and has a direct relationship with the beneficiary. A counterparty acting as principal should be required to not be required to complete it.

Data Field (23), Total notional contract quantity: the guidance states that an estimate must be entered when the total notional quantity is not fixed, without a subsequent lifecycle reporting obligation, and indicates that this may mainly concern Complex or Variable volume optionality in Field (26). We urge clarifying that this treatment applies to every Volume Optionality category in Field (26), except “Fixed”.

As an overarching principle, lifecycle reporting should be required to be required only when the contractual arrangements undergo a material change. A later improvement in the quality of available information, or a refinement of an estimate previously reported, should be required to not in itself be treated as a reportable lifecycle event.

Please upload your file(s) using the following filename format: [Name of the organisation you represent]_REMITTable2_v2

End of survey

Contact

remit.consultations@acer.europa.eu