

OPEN LETTER ON THE IMPLICATIONS OF REGULATION (EU) 2026/256 ON DATA REPORTING

Ljubljana, 09 April 2026

Subject: The implications of Commission Implementing Regulation (EU) 2026/256 on data reporting implementing Article 7c(2), Article 8(1a), Article 8(2) and Article 8(6) of Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency and repealing Commission Implementing Regulation (EU) No 1348/2014

Dear Sir/Madam,

On 09 April 2026, the Commission Implementing Regulation (EU) 2026/256 on data reporting implementing Article 7c(2), Article 8(1a), Article 8(2) and Article 8(6) of Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency and repealing Commission Implementing Regulation (EU) No 1348/2014 ('recast REMIT IR'), was published in the Official Journal of the European Union. ACER has received several questions from stakeholders regarding the new or revised obligations introduced by the recast REMIT IR. The purpose of this letter is to offer clarifications to market participants ahead of the publication of additional guidance by the Agency, to support the timely implementation of provisions entering into force within a shorter timeframe than others and ensuring compliance with the new act.

ACER will issue, in conjunction, another open letter on the new obligations defined in the Commission Delegated Regulation (EU) 2026/255 supplementing Regulation (EU) No 1227/2011 of the European Parliament and of the Council as regards the necessary details for the authorisation and supervision of inside information platforms ('IIPs') and registered reporting mechanisms ('RRMs') by the European Union Agency for the Cooperation of Energy Regulators (EU) ('Delegated Regulation on RRM and IIPs').

To whom is this letter addressed?

This open letter should be of interest to all stakeholders involved in REMIT data reporting or that have notification obligations under REMIT. This includes, for example, market participants, RRM, IIP, organised marketplaces ('OMP'), trade-matching systems, persons professionally arranging or executing transactions ('PPAETs') and national regulatory authorities ('NRAs').

What is expected from the reporting parties?

ACER expects reporting parties to take note of this letter and its Annex and to comply with the new and/or amended reporting and notification obligations stemming from the recast REMIT IR.

In case of further questions on the new or revised obligations, ACER encourages market participants to contact the Agency through the [REMIT query form](#).

Next steps

ACER recognizes that continuous dialogue is essential to effectively address the changes stemming from the recast REMIT IR and to ensure that market participants are well supported in responding to them. To this end, the Agency will maintain active engagement with stakeholders across diverse fora and groups, conducting consultations and discussions to further shape and refine the necessary guidance documents and provide appropriate and timely clarifications.

Sincerely,

Karina Knaus

Head of the Market Information and Transparency Department

ANNEX 1

QUESTIONS FROM STAKEHOLDERS REGARDING THE NEW OR REVISED OBLIGATIONS INTRODUCED BY THE RECAST REMIT IR

The content of this Annex is not exhaustive, and it does not constitute a new policy document. This Annex provides an overview of some of the new or revised data reporting or notification obligations ACER wishes to address ahead of the entry into force of the recast REMIT IR and before additional guidance can be provided via, for example, the Agency's Transaction Reporting User Manual ('TRUM').

This Annex covers:

- A. GENERAL QUESTIONS
- B. QUESTIONS RELATING TO PROVISIONS WHICH BECOME APPLICABLE ON 29 APRIL 2026
- C. QUESTIONS RELATING TO PROVISIONS WHICH BECOME APPLICABLE ON 29 OCTOBER 2027
- D. QUESTIONS RELATING TO PROVISIONS WHICH BECOME APPLICABLE ON 29 APRIL 2028
- E. QUESTIONS RELATING TO EXPOSURE REPORTING
- F. QUESTIONS RELATING TO HYDROGEN REPORTING

GENERAL QUESTIONS

1. When will the reporting based on the recast REMIT IR start?

Whilst the recast REMIT IR as such enters into force on 29 April 2026 (20 days after the publication of recast REMIT IR in the Official journal), several provisions have a delayed application date, and the first report based on the new/updated rules may also be later.

Please consult Annex II of this Open letter for a full overview of all the provisions with a delayed application date.

Whilst this Open Letter primarily focuses on the provisions which enter into force on 29 April 2026, ACER will address some of the provisions with a later application date.

2. How will the transition between the old and new reporting details and formats work?

Article 16 of the recast REMIT IR foresees the transitional measures between Commission Implementing Regulation (EU) No 1348/2014 and the recast REMIT IR. Whilst the Commission Implementing Regulation (EU) No 1348/2014 is repealed with effect from the entry into force of the recast REMIT IR, certain provisions, as described in Article 16, will

continue to apply until the corresponding provisions in the recast REMIT IR becomes applicable ('transition date').

Provision in Commission Implementing Regulation (EU) No 1348/2014	Corresponding provision in the recast REMIT IR	Date on which the new provisions become applicable (transition date):
Article 3 and the Annex	Article 3 and the Annex Article 4(2)	29 October 2027
Article 9(5), 9(9) and 10(1)	Article 12(5), 12(9) and 13(2)	29 April 2028
Article 11(1)	<i>Please note that Article 11(1) does not have a corresponding article in the recast REMIT IR as the legal basis for ACER to authorise RRM and IIPs is established in Articles 4a and 9a of REMIT and the process of authorisation is further defined in the Delegated Regulation on RRM and IIPs</i>	29 October 2027

This means that reporting based on, for example, Article 3 and the Annex to Commission Implementing Regulation (EU) No 1348/2014 will continue until the new provisions in the recast REMIT IR become applicable. It is important to note that whilst the reporting formats and standards continue as per Commission Implementing Regulation (EU) No 1348/2014, the reporting timings will have to follow the new timeframes as foreseen in the recast REMIT IR, please see question 8 below.

As regards Article 11(1) and the transition between the current obligations for RRM and IIPs to be registered and the new obligation for RRM and IIPs to be authorised for reporting in accordance with the Delegated Regulation on RRM and IIPs, please consult the Open letter on the Delegated Regulation on RRM and IIPs.

Article 16 further specifies that transactions reported on the basis of Article 3 of Commission Implementing Regulation (EU) No 1348/2014 (transactions reported before the transition to the recast REMIT IR) are not subject to the requirements of the recast REMIT IR. Such transactions, even if outstanding on the date of transition, do not have to be reported again, following the new formats and standards of the recast REMIT IR. However, updates to such transactions (i.e. lifecycle events) made after the transition date shall comply with the requirements of the recast REMIT IR. In connection with this, ACER would also like to emphasise that any transaction taking place before the transition date, but reported after that date, shall comply with the requirements of the recast REMIT IR.

Finally, Article 16 also foresees for a 'backloading' provision for transactions falling under the new reporting type 'periodic reporting' in Article 4 of the recast REMIT IR. Transactions

concluded before the date on which the reporting obligation in Article 4 becomes applicable, and which are outstanding on that date and which have not already been reported, shall be reported within 90 days after the reporting obligation becomes applicable. Since some of the provisions in Article 4 have different application dates, the deadlines for the backloading provision will vary, please consult the overview table in Annex II of this Open letter.

The reference to “transactions which have not already been reported” targets transaction with final consumers with a capacity of consumption higher than 600 GWh/y, which were previously reported on a continuous basis pursuant Article 3 of REMIT Implementing Regulation 1348/2014, and will move to periodic reporting (unless concluded on an OMP) under Article 4(2) of the recast REMIT IR on 29 October 2027. These type of transactions with final consumers will thus not be subject to the ‘backloading’ provision. In case such a contract was reported before the transition date, but the execution takes place afterwards, the execution is expected to follow the reporting timing and specifications for periodically reported transactions under Article 4(2), meaning the execution would be reported at the first periodic report (please see the overview table in Annex II).

Additional guidance on the transition will be issued by ACER in a dedicated communication closer to the transition date.

3. I am a new market participant that will have reporting obligations once the new rules in the recast REMIT IR become applicable, when do I need to register as a market participant with my relevant NRA?

The registration obligation for market participants is established in Article 9 of REMIT. The registration obligation refers to market participants entering into transactions which are required to be reported pursuant to Article 8(1) of REMIT and it is also specified that the registration form shall be submitted to the relevant NRA before entering into a transaction that is reportable under Article 8(1). Registration should thus be initiated before the reporting obligation becomes applicable. As the recast REMIT IR is now published, market participants have the full overview of which transactions are reportable and when the reporting is foreseen to start. ACER recommends new market participants to initiate their registrations (i.e. the submission of the complete registration form to the NRA) as soon as possible, as the registration process can be complex and the required time may vary depending on the number of applicants.

ACER also reminds market participants that registration is needed in order to disclose inside information (Article 13(3) of the recast REMIT IR). The obligation to disclose inside information is established in Article 4 of REMIT and is already in force. The definition of what constitutes inside information can be found in Article 2(1) of REMIT and is further elaborated in [ACERs Guidance on REMIT application](#). In short, inside information is information of a precise nature which has not been made public, which relates, directly or indirectly, to one or more wholesale energy products and which, if it were made public, would be likely to significantly affect the prices of those wholesale energy products (this also includes ‘new’ wholesale energy products that were added in scope of REMIT II, such as hydrogen and storage). The notion of inside information and the obligation to disclose such information is thus detached from any reporting obligation. Consequently, there may be a need for a market participant to register itself as soon as possible, in order to fulfil the obligation to disclose inside information, even if the market participant will not have any reporting obligations until much later.

4. What are new OMPs that will have reporting obligations once the new rules in the recast REMIT IR become applicable expected to do and what if the status of an OMP is not clear?

First, ACER would like to remind of the OMP obligations already introduced via REMIT II in relation to orderbook reporting, which ACER also addressed in the [Open letter on the implications of the revision of Regulation \(EU\) No 1227/2011 on REMIT data reporting aspects and notification obligations](#). These obligations are already in force and ACER expects OMPs to adhere to these obligations also in relation to the new or changed provisions in the recast REMIT IR. In particular, entities falling within the definition of OMP that now know they will be reporting transactions based on the provisions of the recast REMIT IR shall notify themselves to ACER and submit identifying reference data via the [dedicated form](#). ACER updates the OMP list on a quarterly basis so OMPs are encouraged to submit their notifications as soon as possible and well in advance before the first reporting is to take place. For further guidance on what criteria defines an OMP, please see [Annex IX of the Agency's Transaction Reporting User Manual](#).

In case an entity fails to notify themselves as an OMP to ACER, the recast REMIT IR foresees a possibility for ACER to proactively list such an entity as an OMP. In such scenario, ACER will first contact the entity to discuss its OMP status, before making any changes to the OMP list. In case there is uncertainty about an entity's status as OMP, and the entity is *not* on the [Agency's list of OMPs](#), the transactions pertaining to such an entity, should be considered and reported as bilateral transactions (non-standard contracts), meaning orders would not be reportable. Market participants or reporting parties who are uncertain about the classification of their transactions are always welcome to reach out to ACER through the [REMIT query form](#).

5. How are electricity storage contracts foreseen to be reported?

Recital 8 of the recast REMIT IR explains that wholesale energy products relating to the storage of electricity should be treated in the same way as wholesale energy products relating to the supply of electricity. All provisions for electricity supply transactions should therefore also apply to electricity storage. It is ACER's understanding that electricity storage systems, such as batteries, should be assimilated to consumption or production units, insofar as they function as such, and the related trading activity on the market is thus equivalent to the trading of supply of electricity. It is important to note that the electricity storage unit itself is not considered as a delivery point in this regard and is not expected to be indicated in the transaction report. In case such contracts were not already reported under Commission Implementing Regulation (EU) No 1348/2014, they are expected to be reported as of the entry into force of the recast REMIT IR, following the reporting formats for supply transactions.

As far as reporting thresholds are concerned, ACER would like to stress the following in relation to electricity storage:

- In line with Article 2(4) of REMIT, contracts for the supply and distribution of electricity, hydrogen or natural gas to final customers with a consumption capacity below 600 GWh per year are not treated as wholesale energy products and thus are not reportable under REMIT. However, in line with current guidance, it is ACER understanding that electricity storage systems do not fall under the categorization of 'final consumers' as they are designed to transfer the electricity back to the grid or to a utility.
- For what concerns production units, in line with Article 5 of the recast REMIT IR, contracts for the supply of electricity produced by a single production unit with a capacity equal to or less than 10 MW, or by production units with a combined capacity equal to or less than 10 MW, are reportable only upon reasoned request of ACER and on an ad-hoc basis, unless concluded on organised market places. Due to the nature of electricity storage systems, it is ACER understanding that they can be assimilated to production units and hence this threshold applies also to electricity storage systems.

QUESTIONS RELATING TO PROVISIONS WHICH BECOME APPLICABLE ON 29 APRIL 2026

6. What are the new definitions of ‘transaction’ and ‘lifecycle event’?

The recast REMIT IR has introduced a definition for ‘transaction’ and a definition for ‘lifecycle event’.

‘transaction’ means any trade and order to trade, matched or unmatched, or bilateral contract and its execution related to wholesale energy products, including any lifecycle event of such trade, order to trade or bilateral contract.

‘lifecycle event’ means any modification, cancellation, correction, early termination or, where applicable, execution of any trade, order to trade, matched or unmatched, or bilateral contract related to wholesale energy products.

ACER believes these two definitions are in line with the current reporting practices and does not perceive that these definitions will have an impact on the current reporting framework.

7. What has changed in the definition of standard and non-standard contracts?

The recast REMIT IR has introduced a change to the definitions of standard and non-standard contracts.

‘standard contract’ means a contract concerning a wholesale energy product that is admitted to trading at an organised marketplace.

‘non-standard contract’ means a contract concerning any wholesale energy product that is not admitted to trading at an organised marketplace.

ACER understands this change as a simplification of the two definitions which entail that standard contracts are contracts traded on OMPs, whilst non-standard contracts are contracts traded outside OMPs.

The reasoning for this understanding is that, even when a bilateral transaction is based on a contract admitted to trading at an OMP, it can be assumed that the bilaterally agreed contract entails some elements of customisation, which effectively distinguishes it from the contract admitted to trade on the OMP.

This further implies that all transactions concluded/taking place on an OMP will have to be reported pursuant to the timeframes set for standard contracts, while all transactions occurring outside an OMP (over-the-counter) will have to be reported following the timeframes set for non-standard contracts (see next question).

The reporting details for standard and non-standard contracts are further specified in Article 7 of the recast REMIT IR, where it is also clarified that details of transactions concluded within the framework of non-standard contracts, including their execution, specifying at least an outright volume and price shall be reported using Table 1 of the Annex to the recast REMIT IR.

8. What are the new reporting timeframes for standard and non-standard contracts?

Article 10 of the recast REMIT IR prescribes that standard contracts should be reported *within* two business days (T+2) and non-standard contracts should be reported *within* 10 business days (T+10).

Lifecycle events relating to standard contracts should also be reported *within* T+2 and lifecycle events relating to non-standard contracts should be reported *within* T+10. This effectively means that even if the lifecycle event itself takes place outside an OMP but relates to a transaction that occurred on an OMP, the deadline for reporting is T+2.

ACER expects reporting parties to adhere to the new reporting timeframes as of 29 April 2026. This means that when the conclusion of the trade, the placement of the order, the end of the auction (gate closure), or the occurrence of the lifecycle event takes place before 29 April 2026, the old reporting timeframes are applicable for those transactions. For example, if a non-standard contract is concluded on 28 April 2026 (one day before the entry into force of the recast REMIT IR) the one-month reporting timeframe still applies, and the transaction needs to be reported at the latest on 28 May 2026. Whilst if the transaction occurs on 29 April 2026, it will have to be reported at the latest by 13 May 2026.

ACER reminds that the reporting timeframe for LNG market data remains the same; LNG market data shall be reported as close to real time as technologically possible upon the final agreement on the transaction between the counterparties, or upon placing of the bids or offers.

9. What new obligations on OMPs are applicable as of 29 April 2026?

The recast REMIT IR introduces several new obligations on OMPs which are applicable as of 29 April 2026, in particular:

- Article 8(1) includes a provision for OMPs to report transactions carried out or registered on their platform as a result of the secondary allocation referred to in Article 3, point (b)(ii), irrespective of where the allocation takes place. This means that even if the secondary allocation is concluded outside the OMP (e.g. bilaterally between two market participants), but it is subsequently registered on the OMP, it is expected that the OMP will report such a transaction to ACER. Secondary allocations concluded outside OMPs can be registered on the OMP for various reasons. Secondary allocations concluded outside the OMP but subsequently registered on the OMP are still to be considered as non-standard contracts and should thus follow the reporting timeline for non-standard contracts (see question 8).
- Article 8(1) also includes a provision for OMPs to report the details of primary capacity allocations as specified in Article 3, point (b)(i), where no capacity has been allocated as a result of the allocation process. ACER understands this provision as referring to unsuccessful allocations, where bids were submitted but no allocation took place. This is not a completely new obligation as e.g. Table 3 of the Annex to Commission Implementing Regulation (EU) No 1348/2014 already included the reporting of these types of transactions. ACER expects this reporting to continue in the same manner under the recast REMIT IR. Regarding unsuccessful allocations where no bids were submitted, Article 5(1)(i), which also becomes applicable as of 29 April 2026, specifies that such allocations are only reportable upon ACER's reasoned request and on ad-hoc basis.
- Article 8(3) stipulates that OMPs shall, at the request of the market participant, make the relevant reported data of that market participant available to the market participant on a continuous basis. This includes information as to whether those reported data are in compliance with ACER's validation rules, e.g. report files and return receipts, in decrypted form. This obligation lays on the OMP, however, the OMP, the RRM and the relevant market participant may enter into an agreement allowing the RRM to provide this information directly to the market participant.

- Furthermore, Article 8(3) also introduces a retention period for reported data, where OMPs shall maintain a record of the details of the data reported (including any exogenous data provided to them) in accordance with REMIT for a period of at least five years following the day on which the transaction took place. It is expected that OMPs will start maintaining this record for all transactions taking place after 29 April 2026.

Finally, the recast REMIT IR clarifies that when an OMP reports on behalf of the market participants active on their platform, those market participants shall not report that data to ACER.

10. When will the reporting of system generated orders start?

The definition of 'order book', as introduced in Article 2(21) of REMIT, includes all the details of wholesale energy products executed at an OMP, including system-generated orders. The reporting of system generated orders by OMPs is foreseen in Article 8(1) of the recast REMIT IR, which becomes applicable as of 29 April 2026. However, the provision foresees that ACER needs to activate this type of reporting (reporting is to "commence at the request of the Agency"). Once activated, the reporting shall be carried out on a continuous basis. However, ACER does not plan to request the reporting of system generated orders as of 29 April 2026. ACER will communicate any such request well in advance of the commencement of reporting to ensure an appropriate implementation period.

QUESTIONS RELATING TO PROVISIONS WHICH BECOME APPLICABLE ON 29 OCTOBER 2027

11. How should market participants provide exogenous data to OMPs?

In accordance with Article 8(5) of the recast REMIT IR market participants should provide to the OMP where the trading occurs, information not already available to the OMP, so that the OMP can fulfil its reporting obligations. This type of exogenous information can, for example, be the identification code of the algorithm used by the market participant in its trading activity, if not already known by the OMP, or information on the DEA client, or on sub-clients and final beneficiary, when such information has been made available to the DEA provider. Furthermore, other examples could be the transfer price or price of the transaction in secondary allocation, if not already known by the OMP.

The information should be made available by the market participant to the OMP no later than at the time of reporting as set out in Article 10 of the recast REMIT IR and should be reported by the OMP, via its RRM, as part of the OMP's reporting obligation. How market participants provide this information to the OMP can vary between OMPs, depending on technical possibilities or other business decisions. The information should however be provided in a way that allows for it to be reported by the OMP in the standards and formats established under Article 13(4) of the recast REMIT IR. ACER would like to stress that market participants and OMPs should cooperate in this regard to facilitate the OMP and the market participants to comply with their reporting obligations to provide timely, accurate and complete information.

ACER would also like to clarify the retention requirements on OMPs and market participants in relation to the exogenous data. In accordance with Article 8(3) of the recast REMIT IR, OMPs shall maintain a record of the details of the data they *report* to ACER, for a period of at least 5 years following the day the transaction took place. As the exogenous data provided to

the OMP is included in the data reported to ACER, OMPs are expected to keep also this data. There is no legal requirement on market participants to retain the exogenous data provided to an OMP. Nevertheless, it may be in the market participants interest to maintain a record of this data, as they still have responsibility for the completeness and accuracy of the information in accordance with Article 14 of the recast REMIT IR.

12. Will LNG market data continue to be reported by LNG market participants through TERMINAL?

The reporting of LNG market data was first introduced via Regulation (EU) 2022/2576¹ and later incorporated into REMT through the amending Regulation (EU) 2024/1106². In order to further streamline the reporting of LNG market data with the rest of REMIT data, the recast REMIT IR has incorporated the LNG market data reporting into Table 1 of the Annex to the recast REMIT IR.

This means that LNG market data will continue to be reported by market participants via TERMINAL until the new Table 1 becomes applicable on 29 October 2027. After this date it is expected that LNG market data will be reported via RRM to ARIS by using a new electronic format based on Table 1. ACER will, in accordance with Article 13(4) of the recast REMIT IR consult relevant stakeholders and take into account established industry standards when establishing this electronic format. ACER will publish the electronic format and further guidance on LNG market data reporting by 29 October 2026.

QUESTIONS RELATING TO PROVISIONS WHICH BECOME APPLICABLE ON 29 APRIL 2028

13. How will the periodic reporting, introduced in Article 4, work?

Please note that some of the provisions in Article 4 have different application dates, this question primarily refers to the provisions in Article 4(3), 4(4), 4(5), 4(6) and 4(7).

Article 4 of the recast REMIT IR introduces a new type of reporting on periodic basis. The periodicity varies between the different types of transactions listed in the Article. The timing of reporting of these types of transactions is thus indicated directly in the Article and does not relate to the reporting timeframes established in Article 10 of the recast REMIT IR.

Each of the transactions listed in Article 4 will have to be reported via an electronic format that has to be indicated by ACER after consultation with relevant stakeholders. It is thus not expected that the existing electronic formats, corresponding to Tables 1- 4 in the Annex of the recast REMIT IR, will be used for the reporting of *all* the transactions listed in Article 4, but

¹ Council Regulation (EU) 2022/2576 of 19 December 2022 enhancing solidarity through better coordination of gas purchases, reliable price benchmarks and exchanges of gas across borders

² Regulation (EU) 2024/1106 of the European Parliament and of the Council of 11 April 2024 amending Regulations (EU) No 1227/2011 and (EU) 2019/942 as regards improving the Union's protection against market manipulation on the wholesale energy market

rather than dedicated electronic formats will be established.³ Nevertheless, when possible, existing formats may be used or may form the basis of a specialised format for the transactions listed in Article 4. Transactions listed in Article 4 should be reported in accordance with Article 8, i.e. by OMPs as stated in Article 8(1) or by market participant as stated in Article 8(4), depending on where the transaction occurs.

Please consult Annex II of this Open letter for a full overview of relevant deadlines, application dates and start of reporting for all the provisions in Article 4.

14. How should transactions executed via trade-matching systems be reported?

Article 9 of the recast REMIT IR introduces a possibility for ACER to request the reporting of information referring to transactions executed via trade-matching systems connecting one or more OMPs, insofar as those transactions are reportable under the recast REMIT IR and insofar as the information is needed for the relevant OMPs to fulfil their reporting obligations under Article 8(1) of the recast REMIT IR.

If the information that is to be reported by the OMP is not available to the OMP, but is available to the trade-matching system, Article 9 foresees two ways for this information to be reported. The OMP can either request the operator of the trade-matching system to provide this information directly to the OMP (who then reports it) or the OMP can request the trade-matching system to report it to ACER, on behalf of the OMP. In both cases the information shall be reported to ACER through an RRM.

This type of reporting is to be requested by ACER, and any such request will be referred to the relevant OMPs. Once activated, the reporting of information referring to transactions executed via a specific trade-matching system connecting one or more OMPs shall be carried out on a continuous basis. In accordance with Article 17 of the recast REMIT IR, ACER will provide the electronic formats (corresponding to the details of Table 5 of the Annex to the recast REMIT IR) and further guidance on how these types of transactions should be reported by 29 April 2027.

15. What has changed in the provisions covering reporting of electricity fundamental data?

Article 11 of the recast REMIT IR covers the reporting of fundamental data on electricity. The main change compared to the previous provisions in Commission Implementing Regulation (EU) No 1348/2014 is the addition of paragraph (4) which introduces a requirement for electricity Transmission System Operators (TSOs) to report imbalance settlement data, indicating imbalances, final positions, allocated volumes and, where applicable, imbalance adjustments. The information should be provided per balance responsible party and imbalance settlement period, on a monthly basis, and no later than the last day of the third

³ For avoidance of any doubt, this is also applicable for transactions reportable at request of the Agency (Article 5), where the format shall be specified in the request itself.

month following the month of imbalance settlement. For example, imbalance settlement data for March should be reported by the end of June.

If any of the required information is not available to the relevant TSO, but is available to a third party in line with Article 52 of Regulation (EU) 2017/2195⁴, that third party should provide the TSO with the relevant information to enable the TSO to fulfil its reporting obligation.

The current electronic formats for the reporting of electricity fundamental data will have to be updated to allow for the reporting of this new information. ACER will, in accordance with Article 13(4) of the recast REMIT IR consult relevant stakeholders and take into account established industry standards when updating this electronic format.

In addition, the reporting timeframe in paragraph (3) has been adjusted and reporting is now expected *within* two business days (T+2). A possibility for ACER to request additional information from TSOs, SSOs and DSOs (or RRM reporting on their behalf) has also been added in paragraph (5). Please note that the changes in paragraphs (3) and (5) become applicable as of 29 April 2026.

16. What has changed in the provisions covering reporting of gas fundamental data?

Article 12 of the recast REMIT IR covers the reporting of fundamental data on gas. The main change in this Article refers to paragraphs (5) and (9) where the reporting responsibility now solely falls on the LNG system operator (LSO) and storage system operator (SSO) respectively. Market participants are thus no longer expected to report this type of information after 29 April 2028.

It should also be noted that in paragraphs (3) and (7) the reporting of planned and unplanned unavailability announcements as fundamental data is no longer required (while the publication as inside information remains). Additional changes have also been made in paragraph (3) to facilitate the reporting when LNG facilities operate in groups. Please note that these changes become applicable as of 29 April 2026. On 29 April 2026 the old electronic format will still be in production, reporting parties are therefore advised to leave the fields for planned and unplanned unavailability announcements blank in their reports, until the electronic format has been updated. ACER will, in accordance with Article 13(4) of the recast REMIT IR, consult relevant stakeholders and take into account established industry standards when updating this electronic format.

Finally, the reporting timeframes in paragraphs (2), (6), (8) and (9) have been adjusted and reporting is now expected *within* two business days (T+2). A possibility for ACER to request additional information from TSOs, LSOs, SSOs and DSOs (or RRM reporting on their behalf) has also been added in paragraph (10). Please note that the changes in paragraphs (2), (6), (8) and (10) become applicable as of 29 April 2026.

⁴ Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing

QUESTIONS RELATING TO EXPOSURE REPORTING

17. Which market participants are required to report exposures?

In accordance with Article 8 of REMIT, market participants should report records of their transactions on wholesale energy markets, including information on their exposures. Consequently, only market participants who enter into reportable transactions and are obliged to report records of their transactions under REMIT, can be subject to the obligation to report information about their exposures. Article 6 of the recast REMIT IR further defines the scope of exposure reporting as introduced in Article 8 of REMIT.

Market participants with positions below 600 GWh on a yearly basis, assessed separately for electricity and natural gas, are not required to report their positions resulting from trading wholesale energy products. Consequently, market participants with positions equal to or above 600 GWh on a yearly basis, assessed separately for electricity and natural gas, are required to report their positions. Market participants should assess whether the threshold applies to them once per year, at the end of each calendar year for the upcoming year. Market participants are thus not required to re-assess the threshold during the year. ACER would like to stress that, while no compulsory submission of the exposure threshold calculation is required, market participants should be able to demonstrate their assessment in case of ad-hoc requests from regulators.

In addition, TSOs, DSOs, SSOs, and LSOs that purchase gas or electricity solely for the technological or operational needs of their systems are only required to report their exposure information upon the request of ACER. The timeline and duration of such reporting will be specified in the request itself. ACER will take due account of the needs of the system operators' implementation of the technical specifications when issuing such a request. As exposure reporting is a completely new reporting stream under REMIT, ACER will evaluate whether any reporting requests should be made towards TSOs, DSOs, SSOs, and LSOs once further experience has been gained from the general exposure reporting under Article 6. Hence, no requests towards TSOs, DSOs, SSOs, and LSOs are expected to be issued before ACER has assessed whether the applicable data reporting rules are fit for purpose and issued the report foreseen in Article 15 of the recast REMIT IR.

Additional guidance on exposure reporting will be issued by ACER after consultations with relevant stakeholders, in accordance with Article 17 of the recast REMIT IR.

18. How should market participants assess the threshold for exposure reporting?

The threshold should be assessed as a sum of absolute monthly values resulting from the positions in wholesale energy products with physical delivery or cash settlement, assessed separately for electricity and natural gas, but aggregating the criteria set out in Article 6(3)(b) and 6(3)(c) of the recast REMIT IR. Each market participant⁵ should individually assess

⁵ Except from TSOs, DSOs, SSOs and LSOs who are not subject to the threshold assessment as they are only required to report their exposures if requested by ACER.

whether the threshold applies to them on an annual basis at the end of each calendar year, considering the positions with delivery in the upcoming year.

Market participants with positions equal to or above 600 GWh on a yearly basis, assessed separately for electricity and natural gas, are required to report their positions. As the threshold should be assessed separately for electricity and natural gas, in cases where the market participant is e.g. equal to or above the threshold for electricity, but below the threshold for natural gas, it is expected that the market participant will report its positions for electricity.

In this context, ACER understands that only contracts for the supply of energy shall be considered, therefore, only points (4)(a) and (4)(b) in the definition of 'wholesale energy product' set out in Article 2 of REMIT, shall be taken into consideration. Considering the forward-looking nature of the obligation, spot market data from the day-ahead and intraday timeframes should not be considered for the sake of exposure reporting. Hence, forwards and futures, as well as option contracts shall be included in the calculation of positions, and consequently also when assessing the threshold.

Additional guidance on exposure reporting will be issued by ACER after consultations with relevant stakeholders, in accordance with Article 17 of the recast REMIT IR.

19. How will the exposure reporting, introduced in Article 6, work?

Article 6 of the recast REMIT IR becomes applicable as of 1 January 2027, whilst the first reporting shall take place in October 2027. ACER understands this to mean that, as of 1 January 2027, market participants should assess whether the threshold referenced in paragraph 5 applies to them by considering transactions concluded until 23:59 31 December 2026 with delivery in the upcoming year (1 January 2027 – 31 December 2027). The assessment does not necessarily have to be undertaken *on* 1 January 2027 but can be undertaken at any time before the deadline of reporting in October 2027. What is important is that the date used for the assessment is 31 December 2026 and that the transactions included are for delivery between 1 January 2027 – 31 December 2027.

The market participants who fulfil the threshold are expected to report their positions resulting from trading wholesale energy products once per quarter (the 'reference period'). The position report is expected to cover the positions of the market participant in wholesale energy products with physical delivery or cash settlement within the 18 months following the last day of the reference period, irrespective of where, when and how they were traded. As the first reporting should take place in October 2027, ACER understands that 30 September 2027 will be the last relevant date to be included in the calculation of the positions for the following 18 months. By 31 October 2027, market participants are then expected to carry out the calculation and report their positions, per month, from October 2027 until March 2029 included.

Additional guidance on exposure reporting will be issued by ACER after consultations with relevant stakeholders, in accordance with Article 17 of the recast REMIT IR.

20. When will market participants have to report forecasts of generation and consumption?

Market participants already reporting positions in accordance with Article 6 of the recast REMIT IR may be required to also report information about their forecast of generation and consumption upon the request of ACER.

In accordance with Article 17 of the recast REMIT IR, ACER will provide the electronic formats and guidance on how market participants should report their exposures by 29 October 2026. ACER plans to include guidance on forecasts and placeholders for details on forecasts of generation and consumption in the initial electronic format for exposure reporting, in order to have all components of exposure consulted and ready, in case the reporting of forecasts is requested.

QUESTIONS RELATING TO HYDROGEN REPORTING

21. I am a market participant involved in hydrogen markets and will have reporting obligations once those rules become applicable, when do I need to register as a market participant with my relevant NRA?

As outlined in the answer to question 3, market participants entering into transactions which are required to be reported pursuant to Article 8(1) of REMIT are required to register with their relevant NRA and the registration form shall be submitted before entering into a transaction that is reportable under Article 8(1). Registration should thus be initiated before the reporting obligation becomes applicable. In regard to market participants involved in hydrogen markets, the registration should be initiated before 1 July 2028. ACER recommends new market participants to initiate their registrations well in advance of this deadline, as the registration process can be complex and the required time may vary depending on the number of applicants.

ACER reminds market participants that certain hydrogen contracts are exempted from reporting in accordance with Article 4(9) of the recast REMIT IR. Market participants only engaging in transactions referred to in paragraph 9, points (a)⁶ and (b)⁷ are not required to register.

ACER also reminds market participants that registration is needed in order to disclose inside information (Article 13(3) of the recast REMIT IR). The obligation to disclose inside information is established in Article 4 of REMIT and is already in force, also for what concerns wholesale energy products referring to hydrogen. The definition of what constitutes inside information can be found in Article 2(1) of REMIT and is further elaborated in [ACERs Guidance on REMIT application](#). In short, inside information is information of a precise nature which has not been made public, which relates, directly or indirectly, to one or more wholesale energy products and which, if it were made public, would be likely to significantly affect the prices of those

⁶ transactions relating to the physical delivery of hydrogen produced by a single hydrogen production facility with a production capacity equal to or less than 50 MW

⁷ transactions relating to supply or transportation of hydrogen in geographically confined hydrogen networks in the meaning of Article 52 of Directive (EU) 2024/1788

wholesale energy products. The notion of inside information and the obligation to disclose such information is thus detached from any reporting obligation. Consequently, there may be a need for a market participant to register itself as soon as possible to fulfil the obligation to disclose inside information, although the market participant will not have any reporting obligations until much later.

22. How will hydrogen transactions be reported?

Article 4(8) of the recast REMIT IR introduces the reporting of transactions related to various hydrogen contracts. These transactions are expected to be reported once a year and no later than the last day of the first month of the following year. As Article 4(8) becomes applicable as of 1 July 2028, the first reporting is expected to take place no later than 31 January 2029, covering the period from 1 July 2028 until 31 December 2028. The next report is expected to take place no later than 31 January 2030, covering the period from 1 January 2029 until 31 December 2029, and so on.

Additional guidance on the reporting of hydrogen related transactions will be issued by ACER in a dedicated update to the Agency's Transaction Reporting User Manual, after consultations with relevant stakeholders. In accordance with Article 17 of the recast REMIT IR, ACER will provide electronic formats and guidance on how these types of transactions should be reported by 29 October 2027.

ANNEX 2

OVERVIEW OF THE IMPLEMENTATION PERIOD

REPORTING IMPLEMENTATION SEQUENCE	PROVISION	DESCRIPTION	ACER GUIDANCE AND FORMATS TO BE PUBLISHED BY:	THE PROVISION IS APPLICABLE AS OF:	THE FIRST REPORTING SHALL BE MADE BY:	REPORTING FREQUENCY	BACKLOADING OBLIGATION INCLUDED YES/NO	EXECUTIONS REPORTING YES/NO
1 ST REPORTING WAVE	ARTICLE 6	Exposure reporting	29 October 2026	1 January 2027	31 October 2027	Quarterly	NO	n.a.
	ARTICLE 3 (+Annex)	Transactions to be reported on a continuous basis (EL and NG supply, EL storage, EL and NG transportation capacity)	29 October 2026	29 October 2027	T+2/T+10 from 29 October 2027	Continuous (T+2/T+10)	NO	YES for non-standard contracts
	ARTICLE 4(2)	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			31 January 2028 (for the period 29 October 2027 – 31 December 2027)	Every six months (semester) and no later than the last day of the first month of the following semester	NO	YES, for non-standard contracts
	ARTICLE 7(2) and 10(6)	LNG market data as per Articles 7c and 7d of Regulation (EU) No 1227/2011			29 October 2027	As close to real time as technologically possible	NO	NO

1 ST REPORTING WAVE	ARTICLE 8(5)	Market participants obligation to provide information not already available to the OMP	29 October 2026	29 October 2027	29 October 2027	The information referred shall be made available to the OMP no later than at the time of reporting as set out in Article 10	n.a.	n.a.
	ARTICLE 4(3)	Transactions relating to capacity mechanisms	29 April 2027	29 April 2028	31 January 2029 (for the period 29 April 2028 – 31 December 2028)	Annual basis and no later than the last day of the first month of the following year	YES 28 July 2028	NO
ARTICLE 4(4)	Transactions relating to balancing services in relation to electricity markets	31 July 2028 (for the month of May 2028)			Monthly basis, and no later than the last day of the second month	YES 28 July 2028	NO	
2 ND REPORTING WAVE								

2nd REPORTING WAVE						from the month during which the transactions took place		
	ARTICLE 4(5) and 4(6)	<p>Transactions relating to the storage of natural gas in the Union concluded for a period of 12 months or longer, as a result of a primary capacity allocation</p> <p>Transactions relating to the storage of natural gas in the Union concluded for a period of 12 months or longer, as a result of a secondary capacity allocation</p>			30 June 2028 (for the month of May 2028)	Monthly basis, and no later than the last day of the month following the month during which the transactions took place	YES 28 July 2028	NO
	ARTICLE 4(7)	Transactions related to options, futures, forwards, swaps and any other derivatives relating to the storage of natural gas	29 April 2027	29 April 2028	30 June 2028 (for the month of May 2028)	Monthly basis, and no later than the last day of the month following the month during which the transactions took place	YES 28 July 2028	NO
	ARTICLE 9	Transactions executed via trade-matching systems			At request of the Agency	At request of the Agency, and if requested: continuous	NO	NO
	ARTICLE 11(4)	Fundamental data on electricity: Imbalance settlement data			31 August 2028	Monthly basis, and no later than the last day of the third	n.a.	n.a.

2nd REPORTING WAVE					(for the month of May 2028)	month following the month in which the imbalance settlement took place		
	ARTICLE 12(5)	Fundamental data on natural gas: Removal of market participant reporting obligation, LSO reporting only			29 April 2028	Continuous 12(5)(a) T+2 12(5)(b) in advance of the month ahead	n.a.	n.a.
	ARTICLE 12(9)	Fundamental data on natural gas: Removal of market participant reporting obligation, SSO reporting only			29 April 2028	Continuous T+2	n.a.	n.a.
	ARTICLE 13(2)	Reporting of inside information	29 April 2027 <i>No deadline on the publication of guidance on Article 13(2) is set under the recast REMIT IR. ACER plan on publishing guidance on inside information reporting by 12 months from the entry into force of the recast REMIT IR.</i>	29 April 2028	29 April 2028	Continuous T+1 <i>As per Article 20 of the Delegated Regulation on RRM and IIPs</i>	n.a.	n.a.

3rd REPORTING WAVE	ARTICLE 4(8)	Hydrogen supply, storage and transportation	29 October 2027	1 July 2028	31 January 2029 (for the period 1 July 2028 – 31 December 2028)	Once a year and no later than the last day of the first month of the following year	YES 29 September 2028	YES for non-standard contracts
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