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of Energy Regulators

QUESTIONS AND ANSWERS ON REMIT FEES

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This document clarifies the technical and operational aspects of the fees which the European Union Agency for the Cooperation of Energy Regulators (ACER) shall collect on the basis of Article 32 of Regulation (EU) 2019/942 of the European Parliament and of the Council establishing a European Union Agency for the Cooperation of Energy Regulators (recast ACER Regulation) for the collecting, handling, processing, and analysing of information reported by market participants or third entities reporting on their behalf pursuant to Article 8 of Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (REMIT) and for disclosing inside information pursuant to Articles 4 and 4a of that Regulation. Revenues from those fees may also cover the costs of ACER for exercising the supervision and investigatory powers pursuant to Articles 13 to 13c and Article 16 of REMIT.

The document may be updated following the adoption of the Implementing Act on data reporting and the Delegated Act on authorisation, supervision, withdrawal and orderly substitution of IIPs and RRMIs under REMIT.

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CHAPTER 1: GENERAL INFORMATION ABOUT REMIT FEES

According to Article 32 of the recast ACER Regulation, fees shall be due to ACER for collecting, handling, processing, and analysing information reported by market participants (MPs) or by entities reporting on their behalf pursuant to Article 8 of Regulation (EU) No 1227/2011 (REMIT) and for disclosing inside information pursuant to Articles 4 and 4a of that Regulation. Revenues from those fees may also cover the costs of ACER for exercising the supervision and investigatory powers pursuant to Articles 13 to 13c and Article 16 of REMIT. The fees shall be proportionate to the costs of the services provided in a cost-effective way and shall at the same time be sufficient to cover these costs. In addition, the fees shall be non-discriminatory and shall avoid imposing undue financial or administrative burden on MPs or entities acting on their behalf.

The fee each RRM needs to pay shall be a combination of a flat amount – the enrolment fee – and a variable amount – the transaction records-based fee. Such a composition properly reflects the different cost drivers of the relevant services, and therefore ACER's eligible costs: the number of RRM, the number of MPs for which the RRM reports, and the amount and the characteristics of the data they report.

Commission Decision (EU) 2025/1771 on REMIT fees, adopted on 8 September 2025, repeals the Commission Decision (EU) 2020/2152 and introduces some changes to the previous regulation.

1. What are the key changes introduced by Commission Decision (EU) 2025/1771?

1.1 Costs to be covered by fees

Costs to be covered by the fees include also:

- collecting, handling, processing and analysing of information reported by IIPs, and
- exercising the supervision and investigation powers pursuant to Articles 13 to 13c and Article 16 of Regulation (EU) No 1227/2011.

1.2 Due dates of instalments for RRM

ACER and a RRM may mutually agree that invoices exceeding EUR 250 000 are paid in instalments. The deadline for payment of the

- last instalment in case of invoices exceeding EUR 250 000 and up to EUR 1 000 000 shall not be later than 30 June, and
- deadline for payment of the last instalment in case of invoices exceeding EUR 1 000 000 shall not be later than 30 September.

1.3 Wider reporting obligations

The records included in the REMIT fees also cover transactions related to electricity, hydrogen, or natural gas storage, as well as balancing markets, trade orders, and trade lifecycle events.

1.4 Fee structure changes

RRMs pay a fee composed of several components:

- a flat enrolment fee (a fixed base amount has changed to EUR 15 000)
- an exposure report-based fee component

- correction amount to balance differences between the exposure report-based fee component paid in the previous year and the exposure report-based fee component that would have been paid according to the actual reporting in that year
- a transaction records-based fee component
- correction amount to balance differences between the transaction records-based fee component paid in the previous year and the transaction records-based fee component that would have been paid according to the actual reporting in that year

Once authorised, Inside Information Platforms (IIPs) will also be required to pay an annual flat enrolment fee of EUR 15 000. Debit notes should be sent to IIPs by 31 January each year with payment due within four weeks.

1.5 Structure of a data cluster included in a transaction records-based fee component

One data cluster shall consist of one of the following

- all transaction records reporting wholesale energy products (WEPs) pursuant to Articles 7c and 8 of Regulation (EU) No 1227/2011 reported to ACER on a continuous or periodic basis stemming from a specific market participant using a specific organised market place;
- all transaction records reporting WEPs pursuant to Articles 7c and 8 of Regulation (EU) No 1227/2011 reported to ACER on a continuous or periodic basis stemming from a specific market participant without using an organised market place.

With the new regulation, transportation contracts may not contribute to one data cluster only. If transportation records are reported by an RRM for the same MP, and the transportation contracts include both OMP and non-OMP records, then two separate data clusters are created.

1.6 Reduction factor

Reduction factor includes also fees charged to IIPs. In case the sum of the individual fees calculated for each RRM and each IIP would exceed the amount to be covered by fees, the individual fee that each RRM and IIP will have to pay is decreased by multiplying it with a reduction factor calculated as follows:

$$\frac{\text{Amount to be covered by fees}}{\text{Sum of the individual fees calculated for each RRM and each IIP}}$$

1.7 Inflation adjustments

If collected fees are lower than the eligible costs, then certain fee components will be automatically increased to account for inflation. The adjustment applies in the subsequent year and shall be announced by ACER by 30 June.

1.8 Transitional rules for 2025 & 2026

2025 surcharges: Within two weeks after the Commission Decision (EU) 2025/1771 enters into force, ACER shall send each RRM a debit note for the surcharge to be paid within four weeks. The surcharge is calculated based on how many market participants each RRM reported for during the first half of 2025 (up to 30 June). The total surcharge fee amounts to EUR 7.6 million, representing the deficit under the approved budget following the collection of REMIT fees through the debit notes issued at the beginning of 2025.

2026 transitional regime: Invoices in 2026 may include surcharges if the total fees computed fall short of what was budgeted for 2026 (per the Programming Document). The surcharge for RRM's will be allocated based on the number of data clusters per RRM. There are also adjustments to how correction amounts are calculated in 2026.

2. How is the overall size of the fee determined?

The total amount of the fee calculated and collected for each RRM shall cover the eligible costs.

As stated in Article 32 of the recast ACER Regulation, eligible costs are costs that ACER incurs with REMIT tasks:

- by collecting, handling, processing, and analysing information reported by RRM's and
- by collecting, handling, processing, and analysing information reported by IIPs
- for exercising the supervision and investigatory powers pursuant to Articles 13 to 13c and Article 16 of REMIT.

The eligible costs also include overheads. Each year, the costs for the subsequent year shall be outlined in the programming document, adopted by the Administrative Board of ACER by 31 December. Furthermore, the programming document also provides estimates of the eligible costs planned to be funded by fees for additional two years thereafter.

The eligible costs shall be lower than the EU contribution to ACER according to the EU budget for the respective year. If the costs that ACER incurs with REMIT tasks represent more than half of the overall ACER budget, the eligible costs shall be decreased accordingly.

Similarly, in case the total amount of fee calculated for each RRM exceeds the eligible costs, the overall size of the fee shall be reduced through the pro-rata reduction mechanism.

3. Who shall pay the REMIT fee?

The REMIT fee for the current year n , i.e. the fee covering the eligible costs arising in year n , is to be paid by all entities registered or authorised by ACER as RRM's or IIPs at any time during year n . The RRM's which are already registered on 1 January of year n will receive a debit note in January of year n . The RRM's which register later in year n will pay the debit note upon application and successful registration.

See also Q&As in Chapter 2: Payment process.

4. When will IIPs be a subject to the REMIT fees

The IIPs will be subject to REMIT fees once they are authorised by ACER under the Delegated Act on authorisation, supervision, withdrawal and orderly substitution of IIPs and RRM's under REMIT.

5. How is the pro-rata reduction of the fee applied?

In case the sum of the individual fees calculated for each RRM and each IIP exceeds the amount to be covered by fees, i.e. eligible costs, the individual fee that each RRM and IIP will have to pay is decreased proportionally, i.e. by the same percentage. The decrease affects all fee components attributable to RRM's and IIPs: the enrolment fee for both and, for RRM's, the transaction records-based fee, the exposure report-based fee component and both correction amounts. The percentage decrease is based on the following reduction factor:

$$\frac{\text{Amount to be covered by fees}}{\text{Sum of the individual fees calculated for each RRM and each IIP}}$$

For example, if the amount to be covered by fees equals EUR 9 million and the sum of individual fees for each RRM and IIPs equals EUR 10 million, each RRM or IIP needs to pay only 90% [EUR 9 million/EUR 10 million] of their fee.

6. Is a pro-rata increase of the fee applied as well?

No, a pro-rata increase of the fee does not apply.

7. Is there an automatic adjustment of the fee components' amount for inflation?

In case the total amount of the fee is insufficient to cover the eligible costs, the following amounts are increased by the inflation rate of the Union with effect in the subsequent year:

- a flat enrolment fee component for IIPs of EUR 15 000 in Article 5(1)
- a flat enrolment fee component for RRM of EUR 15 000 in Article 6(1) point (a)
- the cost per exposure reports in amount of EUR 250 in Article 6(2)
- the fee subcomponents per data cluster for transaction records defined in Article 7(2) and Article 7(3) and
- the transaction records-based component in the year of registration for each calendar day from the day of authorisation or registration until the end of the year in amount of EUR 100 defined in Article 7(4).

The inflation rate of the Union to be used is the rate of change for the last 12 months of the 'Eurostat HICP (All items) — European Union all countries' published in May prior to the year when the increase will have effect.

ACER shall publish the increased amounts referred to in paragraph 1 at the latest by 30 June of the year prior to the year when the increase will have effect.

8. Revision of the fee components

The Commission shall evaluate the implementation of Commission Decision (EU) 2025/1771 five years after its entry into force and every five years thereafter.

CHAPTER 2: PAYMENT PROCESS

1. When are the fee debit notes sent and how much time will the RRM and IIPs have to settle their balance?

The fee debit note for the annual fee will be sent no later than 31 January of each year and is to be settled within four weeks.

However, for debit notes exceeding EUR 250,000, ACER and RRM may mutually agree that the fees are paid in instalments. The deadline for payment of the last instalment in case of invoices exceeding EUR 250 000 and up to EUR 1 000 000 shall not be later than 30 June and deadline for payment of the last instalment in case of invoices exceeding EUR 1 000 000 shall not be later than 30 September. The RRM shall submit to ACER a written request for payment in instalments, after they are informed that the amount will exceed EUR 250 000. Separate debit notes will be sent for every instalment.

2. Why is the annual fee to be paid in advance of the service?

Commission Delegated Regulation (EU) 2019/715¹ establishes the framework financial regulation for the bodies which are set up by the Union under the Treaty on the Functioning of the European Union and the Treaty establishing the European Atomic Energy Community and which have legal personality and receive contributions charged to the Union budget. ACER is such a body and, as required by Commission Delegated Regulation (EU) 2019/715, adopted its own financial rules, the Financial Regulation of the Agency², which do not depart from those pursuant to Commission Delegated Regulation (EU) 2019/715.

Pursuant to Article 71 of the Financial Regulation of the Agency, ACER shall provide services by virtue of the tasks entrusted to it only after the corresponding fee or charge has been paid.

3. Are there any measures in case of delayed or no payment?

In case an RRM or IIP is overdue on paying or fails to pay the fee, ACER shall take appropriate legal steps by applying the relevant rules of the Financial Regulation of the Agency, including those on default interest and recovery.

Additionally, if an RRM or IIP is overdue on paying the fee by more than one month, ACER may decide to disable their ability to report data to ACER until the fee is paid in full.

4. Will an RRM receive a breakdown of the fee components?

Each RRM will receive a breakdown of the fee into the enrolment, the transaction records-based fee components and exposure report-based fee component. The transaction-records based fee component will be further broken down by data cluster ('RRM-MP-OMP records' or 'RRM-MP-contracts outside OMP'). The exposure report-based fee component will be further broken down by the number of reports sent per MP.

See also Q&As in Chapter 4: Transaction records-based fee component and its correction amount for further explanations about data clusters formation.

See also Q&As in CHAPTER 5: Exposure report-based fee component and its correction amount for further explanations about data clusters formation.

5. How will RRM be able to keep track of their number of reported transaction records and the resulting fee?

ACER informs RRM about the number of reported transaction records on a quarterly basis.

¹ Commission Delegated Regulation (EU) 2019/715 of 18 December 2018 on the framework financial regulation for the bodies set up under TFEU and Euratom Treaty and referred to in Article 70 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council (OJ L 122, 10.5.2019, p. 1).

² Decision No 8/2019 of the Administrative Board of the Agency for the Cooperation of Energy Regulators of 21 June 2019 on the Financial Regulation of the Agency for the Cooperation of Energy Regulators.

6. Payment process for RRM or IIPs which deregister or renounce the authorisation with ACER in the middle of the year

6.1 When does an RRM have to request the termination of their registration or renounce the authorisation with ACER in order not to pay fees for the following year?

RRMs or IIPs which informed ACER at any point during year n , but no later than 31 December of year n , that they no longer want to remain registered or authorised by ACER and will not be submitting any transaction or inside information records, including those pertaining to fundamental data, in year $n+1$, will not be included in the fee calculation for year $n+1$.

These RRM s are, however, still required to pay the fee for the current year n in full and are not entitled to any reimbursement of paid fees or to the waiving of any fees due.

For other questions related to deregistered RRM s or IIPs, see also:

- Chapter 3: Enrolment fee component, ‘2.1 Do deregistered RRM s/IIPs or RRM s/IIPs that renounced the authorisation with ACER also need to pay the enrolment fee component?’; and
- Chapter 4: Transaction records-based fee component and its correction amount, ‘5 Transaction records-based fee and the correction amount for deregistered RRM s or RRM s that renounced the authorisation with ACER’.

6.2 What are the fee implications for an RRM during the period between notifying ACER of its intention to deregister or renouncing the authorisation and the actual cessation of reporting?

During the interim period between the notification in year n and the actual cessation of reporting, the RRM remains fully registered/authorised and obliged to comply with reporting requirements. If the RRM continues reporting into year $n+1$, it will be liable for the full REMIT fees applicable for that year.

7. Payment process for RRM s or IIPs which are registered or authorised in the middle of the year

Entities submitting their RRM or IIP registration or authorisation application in year n shall pay 50% of the flat enrolment fee when initiating the process to become an RRM or IIP. ACER will accept the application only when such a fee is paid. In case ACER rejects the application because the entity does not comply with the RRM or IIPs requirements, the entity is not entitled to a reimbursement of the paid fee.

Once an entity is registered or authorised as an RRM or IIP, ACER shall send the entity a debit note for the remaining fee amounting to 50% of the flat enrolment fee.

Furthermore, unless a newly registered RRM declares that they will solely report fundamental data, the RRM will, in addition to the enrolment fee, also need to pay the transaction records-based fee component for the year of the registration. This is equal to EUR 100 for each calendar day from the day of registration until the end of the year. Such an amount corresponds to the median transaction records-based fee component paid by RRM s, divided by 365. In case an RRM believes that the amount is unrepresentative of their expected reporting, the RRM and ACER may mutually agree on a different amount to better reflect the expected reporting by the RRM. Regardless of the amount, the transaction records-based fee shall be paid when the entity is successfully registered or authorised as an RRM.

For all the questions related to newly registered RRM s, see also:

- Chapter 3: Enrolment fee component, ‘2.2 Do newly registered or authorised RRM or IIPs also need to pay an enrolment or yearly fee component?’; and
- Chapter 4: Transaction records-based fee component and its correction amount, ‘6 Transaction records-based fee and the correction amount for newly registered or authorised RRM’s’.

8. Payment process for suspended RRM or IIPs

RRMs or IIPs which are temporarily suspended by ACER are obliged to pay the REMIT fees in full.

Suspended RRM or IIPs may decide to deregister or renounce the authorisation with ACER at any time during their suspension period.

9. Potential transfer of fees between RRM or IIPs and MP

9.1 Will a MP receive an overview of the transaction records-based fee component or exposure report-based fee component for the transaction records or exposure reports reported on their behalf?

The sharing of such information with MP is currently not envisaged by ACER. The MP is, however, encouraged to reach out to the RRM which they use for reporting and obtain such information from them. RRM will receive an overview of the reporting and should be able to share this information with their clients.

9.2 Is there a safeguard, condition or limit on how the RRM or IIPs will pass the fee onto the MP?

The charging of the REMIT fee between an RRM or IIP and their MP depends on the individual reporting arrangements between them. ACER has no mandate to monitor how RRM or IIPs pass the fees onto MP or, more generally, to monitor the fees charged by RRM to MP.

RRM may apply a different cost recovery scheme towards MP, including for instance flat-rate or pro-rata approaches. ACER considers this to be in the domain of the RRM-MP bilateral arrangements.

9.3 What happens if an MP does not pay the ACER REMIT fee to the RRM or IIP at all or on time?

Payment discipline and its enforcement is part of the individual reporting arrangements between RRM or IIP and MP.

10. VAT treatment

ACER is not a VAT-registered entity; as a result, the issued debit notes will not have a VAT component.

The EU Commission and its institutions are VAT exempt according to Articles 3 and 4 of the Protocol 7 of the Treaty on the Functioning of the European Union on the privileges and immunities of the European Union.

CHAPTER 3: ENROLMENT FEE COMPONENT

1. How high is the enrolment (yearly) fee component?

The enrolment or yearly fee is a flat fee and is set to EUR 15 000 per RRM or IIP. It is paid annually as well as upon the initial registration/authorisation of a RRM or IIP.

2. Which RRMs or IIPs need to pay the enrolment or yearly fee component?

The RRM or IIP enrolment or yearly fee reflects ACER's costs for processing applications for registration or authorisation as well as for monitoring compliance of the already registered or authorised RRMs or IIPs with the RRM or IIP requirements. The RRM or IIP enrolment or yearly fee for the current year n is therefore to be paid by all entities registered or authorised by ACER as RRMs or IIPs at any time during year n .

2.1 Do deregistered RRMs/IIPs or RRMs/IIPs that renounced the authorisation with ACER also need to pay the enrolment fee component?

RRMs or IIPs which informed ACER at any point during year n , but no later than 31 December of year n , that they no longer want to be registered or authorised by ACER and will not be submitting any data records or inside information reports, including those pertaining to fundamental data, beyond 31 December of year n will not be included in the fee calculation for year $n+1$. Such RRMs or IIPs are, however, still required to pay the fee for the respective (running) year n in full and are not entitled to any reimbursement of the paid fees or to the waiving of any fees due.

See also:

- Chapter 2: Payment process, '6 Payment process for RRMs or IIPs which deregister or renounce the authorisation with ACER in the middle of the year'; and
- Chapter 4: Transaction records-based fee component and its correction amount, '5.1 Do deregistered RRMs or RRMs that renounced the authorisation with ACER also need to pay the transaction records-based fee component?'.

2.2 Do newly registered or authorised RRMs or IIPs also need to pay an enrolment or yearly fee component?

Entities submitting their RRM or IIP registration or authorisation application in year n shall pay 50% of the flat enrolment or yearly fee when initiating the process to become an RRM or IIP. In case ACER rejects the application because the entity does not comply with the RRM or IIP requirements, the entity is not entitled to a reimbursement of the paid portion of the enrolment or the yearly fee. Once an entity is registered or authorised as an RRM or IIP, ACER shall send the entity a debit note for the remaining fee consisting of 50% of the flat enrolment or yearly fee.

Unless a newly registered or authorised RRM declares that they will solely report fundamental data, they will additionally need to pay the transaction records-based fee component once registered.

See also:

- Chapter 2: Payment process, '7 Payment process for RRMs or IIPs which are registered or authorised in the middle of the year';

- Chapter 4: Transaction records-based fee component and its correction amount, '6 Transaction records-based fee and the correction amount for newly registered or authorised RRM's'.

CHAPTER 4: TRANSACTION RECORDS-BASED FEE COMPONENT AND ITS CORRECTION AMOUNT

1. What is a transaction record?

A transaction record is any transaction (trade done on a standard contract, bilateral trade, execution of a non-standard contract, order to trade, and non-standard contract) reportable under Tables 1 and 2, as well as any transaction (bid or right) related to electricity and gas transportation contracts reportable with Tables 3 and 4. With regard to Tables 1 and 2, every lifecycle event of a transaction is considered a new record. With regard to Tables 3 and 4, each reported bid and each allocated right, including all its versions, is considered a record. Reporting multi-shape profiles (e.g. orders with multiple blocks) does not affect the record count.

1.1 Do records referring to transactions with financially settled WEPs count towards the transaction records-based fee component?

Yes, all transaction records, including those referring to financially settled WEPs, that are reported to ACER count towards the transaction records-based fee component.

1.2 What is fundamental data and is it counted towards the transaction records-fee component?

Fundamental data covers:

- the ENTSO-E transparency platform data and nominations information for electricity according to Article 8 of Regulation (EU) No 1348/2014 (REMIT Implementing Regulation); and
- the ENTSO-G platform data, nominations, the availability of LNG facilities, the loading and unloading of LNG, the amount of storage facilities, and the amount of gas stored for natural gas according to Article 9 of the REMIT Implementing Regulation.

Fundamental data is not subject to REMIT fees. The transaction records-based fee component is therefore not applicable to RRM's reporting only fundamental data. Similarly, if an RRM reports both fundamental data and transaction records, they will only be charged for their transaction records.

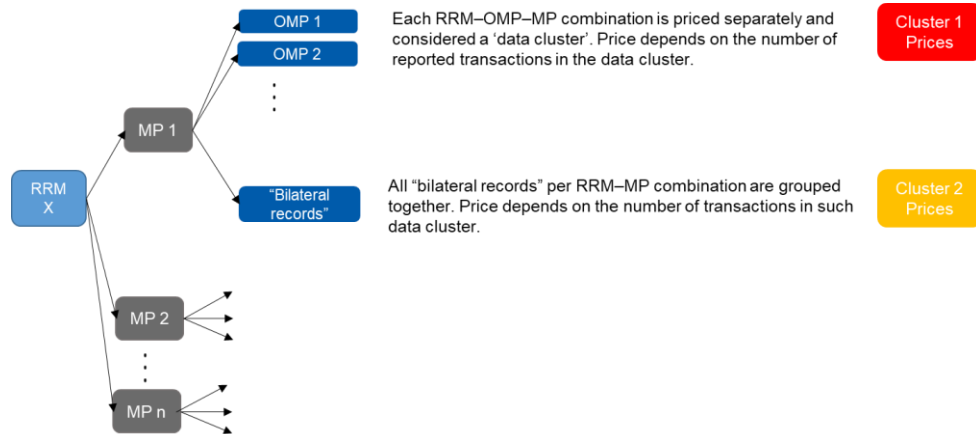
2. How high is the transaction records-based fee component?

The transaction records-based fee component in year n is based on the number of transaction records reported in year $n-1$, as well as their complexity and diversity.

All transaction records reported by an RRM on behalf of a specific MP are split into several data clusters:

- The **RRM-MP-OMP records** data cluster. All transaction records referring to transactions (including orders and lifecycle events for supply or transportation contracts) with standard contracts that took place on an OMP form an 'RRM-MP-OMP records' data cluster. If such transaction records refer to transactions taking place on different OMPs, multiple clusters are formed, one for each unique RRM-MP-OMP combination.

- The **RRM-MP-contracts outside OMP** data cluster. All transaction records referring to transactions (including orders and lifecycle events for supply or transportation contracts) with contracts that took place off-OMP, including non-standard contract framework records, are grouped together and treated as one cluster of 'RRM-MP-contracts outside OMP'.



The fees for a unique '**RRM-MP-OMP records**' cluster are defined in Article 7, paragraph 2 of Commission Decision (EU) 2025/1771.

Transaction records per data cluster	Fee subcomponent in EUR
1 to 100	250
101 to 1 000	500
1 001 to 10 000	1 000
10 001 to 100 000	2 000
100 001 to up to 1 million	4 000
More than 1 million to up to 10 million	8 000
More than 10 million to up to 100 million	16 000
More than 100 million to up to 1 billion	32 000
More than 1 billion to up to 2 billion	64 000
More than 2 billion	96 000

The fees for a unique '**RRM-MP-contracts outside OMP**' cluster are defined in Article 7, paragraph 3 of Commission Decision (EU) 2025/1771.

Transaction records per data cluster	Fee subcomponent in EUR
1 to 10	250
11 to 100	500
101 to 1 000	1 000
1 001 to 10 000	2 000
10 001 to 100 000	4 000
100 001 to up to 1 million	8 000
More than 1 million to up to 10 million	16 000
More than 10 million	32 000

3. What is the correction amount of the transaction records-based fee?

In the beginning of year n , the transaction records-based fee component is estimated on the number of transaction records submitted in year $n-1$. However, at the beginning of year $n+1$, when the actual number of reported transaction records in year n is known, the transaction records-based fee component for year n is recalculated using the actual number of reported transaction records in year n .

The difference between the transaction records-based fee calculated using the number of transaction records reported in year n and the transaction records-based fee calculated using the number of transaction records reported in year $n-1$, is either a positive or negative correction amount.

A positive correction amount is to be paid in full. A negative correction is subtracted from the transaction records-based fee calculated for year $n+1$, but only to the extent that the combined amount of the transaction records-based fee decreased by the correction amount remains positive or zero.

The correction amount is added to the fee debit note for year $n+1$ as a subcomponent of the transaction records based-fee component.

The correction amount in 2026 calculated for 2025 is calculated by subtracting the transaction records-based fee component paid in 2025 from the value obtained by calculating the transaction records-based fee component in 2026 with the ranges and prices of individual clusters which are the same as used for 2025 calculations. The fee subcomponents per data cluster for:

- (a) transaction records reporting WEPs pursuant to point (a) of Article 3(1) of REMIT Implementing Regulation stemming from a specific market participant using a specific organised market place;
- (b) and all transaction records reporting WEPs pursuant to point (b) of Article 3(1) of REMIT Implementing Regulation stemming from a specific market participant

are as follows:

Transaction records per data cluster	Fee subcomponent in EUR
1 to 1 000	250
1 001 to 10 000	500
10 001 to 100 000	1 000
100 001 to 1 million	2 000
More than 1 million to up to 10 million	4 000
More than 10 million to up to 100 million	8 000
More than 100 million	16 000

The fee subcomponents per data cluster for all transaction records reporting WEPs pursuant to point (a) of Article 3(1) of REMIT Implementing Regulation stemming from a specific market participant without using an organised market place are as follows:

Transaction records per data cluster	Fee subcomponent in EUR
1 to 100	250
101 to 1 000	500
1 001 to 10 000	1 000
10 001 to 100 000	2 000

100 001 to 1 million	4 000
More than 1 million to up to 10 million	8 000
More than 10 million	16 000

4. Which RRM's need to pay the transaction records-based fee component?

The RRM transaction records-based fee component is to be paid by all entities registered or authorised by ACER as an RRM at any time during year n which are expected to submit transaction records in year n . Such entities are RRM's which either already submitted transaction records in year $n-1$, or new RRM's which registered or were authorised in year n for the reporting of Table 1 to Table 4 data, as defined in the Annex of the REMIT Implementing Regulation.

The transaction records-based fee component is not applicable to RRM's reporting only fundamental data.

5. Transaction records-based fee and the correction amount for deregistered RRM's or RRM's that renounced the authorisation with ACER

5.1 Do deregistered RRM's or RRM's that renounced the authorisation with ACER also need to pay the transaction records-based fee component?

RRM's which inform ACER they want to deregister or renounce the authorisation at any moment in year n are required to pay the transaction records-based fee component for year n in full, including any potential positive correction amount or the transaction records-based fee component charged in year n . They are not entitled to any reimbursement of the paid fees or to the waiving of any fees due. If the RRM continues reporting into year $n+1$, it will be liable for the full REMIT fees applicable for that year.

6. Transaction records-based fee and the correction amount for newly registered or authorised RRM's

6.1 Do newly registered or authorised RRM's also need to pay the transaction records-based fee component?

Yes, newly registered or authorised RRM's also need to pay the transaction records-based fee component, which is EUR 100 for each calendar day from the day of registration until the end of the year. Such an amount corresponds to the median transaction records-based fee component paid by RRM's, divided by 365. RRM's and ACER may bilaterally agree on a different amount in order to better reflect the expected reporting by the relevant RRM.

6.2 Does the correction amount apply to newly registered or authorised RRM's?

Yes, the correction amount applies to newly registered or authorised RRM's. At the end of the first year of the RRM registration/authorisation, the transaction records-based fee component is calculated using the actual number of reported transaction records and compared to the transaction records-based fee component calculated using a daily rate of EUR 100.

6.3 How do we estimate the transaction records-based fee component for year $n+1$ for the RRM's which were newly registered or authorised during year n ?

RRM's which were newly registered or authorised in year n submitted their transaction records only in a portion of year n . To estimate the annual number of transaction records and the appropriate transaction records-based fee component in year $n+1$, the number of reported

transaction records is scaled up from the actual reporting period (which is less than a year) to a full year, considering a flat transaction reporting profile.

This estimated number of transaction records in year n represents the parameter used to quantify the transaction-records based fee in year $n+1$.

See also:

- Chapter 2: Payment process, point '7. Payment process for RRM's or IIP's which are registered or authorised in the middle of the year'.

7. How will the updating of the guidance (TRUM) in the future impact the fee calculation?

The guidance will continue being updated based on consultations pursuant to the REMIT Implementing Regulation, as was done in the past. In the future, the guidance may be further enhanced, however, with no intent to inflate the fees. The fees shall always be in line with the REMIT fee decision. The backstop to such behaviour is the cost-driven fee calculation; regardless of the number of reported transaction records, the overall fee received by ACER shall never surpass the eligible costs.

8. General considerations when calculating the transaction records-based fee

8.1 Which timestamp is considered when assessing the year of a transaction record's reporting?

The assessment of the year in which a transaction record is reported is based on the transaction record's submission time, i.e. the timestamp when the file, including the transaction record, was submitted to ARIS. For this purpose, UTC time is used.

Only the submission time is relevant for the purpose of the fee calculation. No business-related timestamps, such as Table 1 Data Field No (30) Transaction timestamp, Table 2 Data Field No (12) Contract date, Table 3 Data Field No (9) Bid time interval or Table 4 Data Field No (10) Start date and time, are therefore taken into account. The list of field examples is not exhaustive. All business-related timestamps reported to ARIS are irrelevant for the fee calculation.

8.2 Will the transactions that occurred before the fee introduction but were reported to ARIS only after the fee introduction ('backloading') be charged?

Yes. Whether or not the transaction record is counted depends only on the time when the record was submitted to the ARIS database.

8.3 Counting of transaction records which trigger validation rules

All transaction records inserted into the ARIS database count towards the transaction records-based fee.

Transaction records are reported to ARIS in the form of xml files. Upon each file submission, the file is checked against several rules to assure that the file and its content meet the required standards as described in the ACER REMIT Information System Data Validation Document. These checks assure the validity of the file and/or the transaction records in the file. Depending on the errors (not) occurring when performing the checks, all transaction records in the file are either inserted into the ARIS database or rejected. A transaction record can be in breach of certain validation rules and still be inserted into ARIS database.

To determine whether the transaction records from any file sent to ARIS have been inserted into ARIS database, RRM can consult the Technical Receipt part of the Data Validation Receipt generated by ARIS and received by RRM after each file submission. If the status included in the Technical Receipt is populated with value 'Accepted', this means that all transaction records in the file were inserted into the ARIS database. In all other instances, all records submitted in the file have been rejected and were not included in the ARIS database.

8.4 Counting of transaction records which were accidentally submitted multiple times

All transaction records inserted into the ARIS database count towards the transaction records-based fee. If a transaction record is an exact duplicate of an existing transaction record (i.e. all reported fields are identical), the transaction record is invalid but is still inserted into the ARIS database. For this reason, all submissions of a transaction record will be considered in the transaction records-based fee calculation.

8.5 Counting of transaction records which were submitted to the testing environment

Transaction records submitted to 'TESTFRAMEWORK', i.e. the ARIS testing environment, are not considered in the transaction records-based fee component calculation.

8.6 Counting of transaction records which were submitted through a parallel reporting channel

Transaction records submitted to ACER through a parallel reporting channel are inserted into the ARIS databases. They are therefore considered in the transaction records-based fee component. Reporting via a parallel reporting channel is only to be used exceptionally based on the specific instructions given by ACER.

8.7 Will additional fees be charged in case of a resubmission request by ACER or national regulatory authorities (NRAs) due to insufficient data quality?

Yes, transaction records need to be reported as per TRUM. In case of poor data quality, ACER may ask for the resubmission of the transaction records. In such circumstances both the initially reported records and their corrections will be considered in the transaction records-based fee calculations.

8.8 Will the fees be charged for additional information collected based on the Article 6 (8) of REMIT Implementing regulation?

Additional information collected based on the Article 6 (8) of REMIT Implementing regulation will not be considered for the transaction records-based fee calculation.

9. Attribution of transaction records to the 'RRM-MP-OMP records' data clusters

Transaction records describing transactions related to standard contracts for the supply or transportation contracts (primary or secondary allocation) of electricity and natural gas and executed on OMPs attribute to an 'RRM-MP-OMP records' data cluster.

Supply contracts

The transaction records describing transactions related to standard supply contracts are reported to ACER using the fields outlined in Table 1 as defined in Annex of REMIT Implementing Regulation. In Table 1 schema to report trades, one transaction record equals one 'TradeReport' of the provided 'TradeList'. In Table 1 schema to report orders, one transaction record equals one 'OrderReport' of the provided 'OrderList'.

A supply transaction record describing transactions executed on OMPs is attributed to the 'RRM-MP-OMP records' cluster as follows:

- The RRM sending the information is identified based on the user (name) who submits the file, which uniquely identifies the RRM; the code of the same RRM should however also be inserted into Table 1 Data Field No (6) Reporting entity ID.
- The MP is identified via Table 1 Data Field No (1) ID of the market participant or counterparty. In case an MP uses several different codes, the different codes are mapped in line with the codes available in CEREMP. As of 2024, the MP is identified by using Table 1 Data field No (8) Beneficiary ID, if available, or Table 1 Data Field No (1) ID.
- The OMP is identified via Table 1 Data Field No (27) Organised market place ID / OTC. In case the OMP uses several different codes, the different codes are mapped in line with the codes available in the List of Organised Market Places.

Transactions reported under Table 1 but traded off-OMPs (Table 1 Data Field No (27) Organised market place ID / OTC is populated with 'XBIL') are not attributed to the 'RRM-MP-OMP records' data cluster; they are instead attributed to the corresponding 'RRM-MP-contracts outside OMP' data cluster.

Transportation contracts

All transaction records related to the transportation of electricity or natural gas reported by the same RRM on behalf of the same MP and executed on the same OMP are grouped together into one 'RRM-MP-OMP records' cluster. This data is reported using data formats defined as Table 3 and Table 4 in the Annex of the REMIT Implementing Regulation.

Files containing one or more transaction records related to the transportation contracts are submitted to ACER by an RRM. The RRM sending the information is identified based on the user (name) who submits the file, which uniquely identifies the RRM. For transaction records related to transportation contracts, the code of the RRM that sends the file should also populate Table 3 Data Field No (4) Sender identification or Table 4 Data Field No (1) Sender Identification.

The MP in the 'RRM-MP-OMP records' data cluster is conceptually the MP which receives the capacity. For transaction records describing

- primary allocation bids and/or the results of primary allocations, the MP is identified using Table 3 Data Field No (16) Bidding party or Table 4 Data Field No (27) Market participant identification.
- secondary allocation bids and/or the transfer of rights, the MP is identified using Table 3 Data Field No (36) Transferee party or one of the following two Table 4 fields: Table 4 Data Field No (27) Market participant or Data Field No (37) Transferee identification. The latter is only used when Table 4 Data Field No (27) Market participant is left empty.

The OMP in the 'RRM-MP-OMP records' data cluster is identified as follows:

- Table 3: Currently, no information on the OMP is available. As a result, all reported records are attributed to a single fictitious OMP and therefore assigned to the 'RRM-MP-OMP records' data cluster. In the future, the Table 3 schema is expected to be updated to include OMP information; this section will be revised accordingly at that time.

- Table 4: The relevant data is provided in Data Field No (2) Organised Market Place Identification. If the reported code is not recognised as an OMP, the record is attributed to the 'RRM-MP-contract outside OMP' data cluster.

Reports on unsuccessful auctions where no bids were received are not counted towards the REMIT fees.

9.1 Are transaction records sent as a part of an 'OMP full set' included in the transaction records-based fee?

Yes, such transaction records are counted towards the transaction records-based fee component.

9.2 Can a transaction record be attributed to the 'RRM-MP-OMP records' cluster based on the Table 1 Data Field No (8) Beneficiary ID, considering that the MP executing the trade may act as a principal?

Yes, the MP in the 'RRM-MP-OMP records' data cluster is identified using Table 1 Data Field No (8) Beneficiary ID if the field is reported.

9.3 Are transaction records of orders and their lifecycle events included in the 'RRM-MP-OMP records' cluster? What about trades and their lifecycle events? What about erroneous transaction records?

Yes, all transaction records containing details of transactions with standard contracts reported using Table 1 (orders and trades), including their lifecycle events, erroneous transaction records and their corrections, are attributed to the appropriate 'RRM-MP-OMP records' cluster.

9.4 Are transaction records representing a matched order and transaction records representing a resulting (one-sided) trade treated as one unique transaction record or two separate transaction records?

A transaction record representing a matched order and a transaction record representing the trade resulting from the matched order(s) are treated as two separate transaction records.

9.5 Is a submission of a standard contract (i.e. a contract in 'ContractList' in Table 1 schema) attributed to any 'RRM-MP-OMP records' cluster?

Records reported using Table 1 fields where only the data fields related to contract details (from Data Field No (21) Contract ID to Data Field No (29) Last trading date and time) are filled in are not considered transaction records and are therefore not attributed to any 'RRM-MP-OMP records' cluster.

9.6 When grouping transaction records by OMP, are transaction records additionally grouped/differentiated by market segment or contract type?

Grouping is based on the OMP reported in Table 1 Data Field No (27) Organised market place ID / OTC. In case an OMP uses several different identifiers (operating MIC, segment MICs, LEI, ACER code), the different codes are mapped in line with the codes available in the List of Organised Market Places.

In case an OMP offers several contract types, this will not affect the grouping in any way.

9.7 Treatment of MPs belonging to the same group

Identification of MPs is based on CEREMP; one entity in CEREMP will also be treated as one entity for the purpose of the fees. Transaction records reported by MPs belonging to the same group will therefore not be part of the same cluster, but will form several individual 'RRM-OMP-MP records' data clusters.

9.8 Counting of transaction records reported with an invalid RRM code [Table 1 Data Field No (6) Reporting entity ID]

Transaction records reported with an invalid RRM code are rejected before entering into the ARIS database and are therefore not counted towards the transaction records-based fee.

9.9 Counting of transaction records reported with an invalid OMP code [Table 1 Data Field No (27) Organised market place ID / OTC] or invalid MP code [Table 1 Data Field No (1) ID of the market participant or counterparty]

Transaction records reported with an invalid OMP or MP code are counted for the purpose of the transaction records-based fee component. Invalid codes are OMP codes that are not included in the 'List of Organised Market Places' and MP codes that are not included in CEREMP. Even though an invalid OMP or MP code triggers validation rules, such transaction records still enter into the ARIS database.

Each invalid OMP or MP code forms a separate 'RRM-OMP-MP records' data cluster. In case several transaction records are reported with the same invalid OMP or MP code, all the transaction records belong to the same data cluster.

If an MP reports records with an MP code, which is at the time of submission not registered in CEREMP, the record will be inserted in ARIS as invalid. However, if the MP registers such code later during the year and if it is assigned to a single MP in CEREMP on 1 January of the year following the year of the records submission, records with the code registered after the time of submission are assigned to the 'RRM-OMP-MP records' data cluster of the MP to which the code belongs.

If the reported MP code is registered by more than one MP, records with such MP code forms a separate 'RRM-OMP-MP records' data cluster.

If an MP needs to change the ACER code (e.g. due to a technical issue), records reported with the old ACER code may be grouped together with the new ACER code based on the request sent by the RRM.

After Brexit, a UK MP was able to re-register with another EU-27 NRA to obtain a new EU-27 ACER code. RRM's were able to report lifecycle events with the old UK ACER codes using a parallel channel until the end of 2021. Records reported with the old UK ACER codes were grouped with the associated new EU-27 ACER codes if the re-registered MPs reported the previous UK ACER codes in CEREMP. ACER informed the RRM's in 2020 that for any lifecycle events occurring in 2022, MPs would have to novate the trades and report them via a regular channel. Therefore, for fees charged in January 2024 or later, such grouping will no longer be done, as all trades should have been novated in 2022.

9.10 Counting of transaction records referring to a non-accepted delivery point or zone code [Table 1 Data Field No (48) Delivery point or zone]

Transaction records reported with a non-accepted delivery point or zone code are counted for the purpose of the transaction records-based fee component. Even though a reference to a

non-accepted delivery point or code triggers validation rules, such transaction records still enter the ARIS database.

The delivery point or zone is, however, not part of the clustering, which means that the reporting of non-accepted codes has no impact on the formation of the 'RRM-OMP-MP records' data cluster. Transaction records where the delivery point or zone refers to a non-accepted code will be included in the 'RRM-OMP-MP records' data cluster in the same manner as transaction records referring to an accepted delivery point or zone code. In case a transaction record is reported with multiple delivery points or zones, this will not impact the counting of the records, i.e. such a record will still only be counted once.

10. Attribution of transaction records to the 'RRM-MP-contracts outside OMP' data cluster

Records belonging to the 'RRM-MP-contracts outside OMP' data clusters are reported using either Table 1, Table 2, Table 3 or Table 4 as defined in the Annex of the REMIT Implementing Regulation.

Supply contracts

Any transaction record describing a transaction with a contract for the supply of electricity and natural gas executed off-OMP which is reported using fields as in **Table 1**, is attributed to the corresponding 'RRM-MP-contracts outside OMP' data cluster as follows:

- The RRM sending the information is identified based on the user (name) who submits the file, which uniquely identifies the RRM; the code of the same RRM should, however, also be inserted into Data Field No (6) Reporting entity ID.
- The MP is identified via Table 1 Data Field No (1) ID of the market participant or counterparty. In case an MP uses several different codes, the different codes are mapped in line with the codes available in CEREMP. As of 2024, the MP is identified by using Table 1 Data field No (8) Beneficiary ID, if available, or Table 1 Data Field No (1) ID of the market participant or counterparty.
- Whether or not the transaction took place on a listed OMP is assessed based on Data Field No (27) Organised market place ID / OTC. The transaction records where this field is populated with value 'XBIL' are attributed to the 'RRM-MP-contracts outside OMP' data cluster.

In the Table 1 schema, one transaction record equals one 'TradeReport' of the provided 'TradeList'.

Furthermore, the 'RRM-MP-contracts outside OMP' cluster also includes all transaction records reported using details set out in **Table 2**, i.e. non-standard supply contracts. In that case, the attribution to the appropriate 'RRM-MP-contracts outside OMP' data cluster is carried out as follows:

- The RRM sending the information is identified based on the user (name) who submits the file, which uniquely identifies the RRM; the code of the same RRM should also be inserted into Data Field No (5) Reporting entity ID.
- The MP is identified via Table 2 Data Field No (1) ID of the market participant or counterparty. In case an MP uses several different codes, the different codes are mapped in line with the codes available in CEREMP. As of 2024, the MP is identified by using Table 2 Data field No (7) Beneficiary ID, if available, or Table 2 Data Field No (1) ID.

In Table 2 schema, one transaction record equals one 'nonStandardContractReport' of the provided 'TradeList'.

Transportation contracts

All transaction records related to the transportation of electricity or natural gas reported by the same RRM on behalf of the same MP and executed outside OMP are grouped together into one 'RRM-MP-contracts outside OMP' data cluster. This data is reported using data formats defined as Table 3 and Table 4 in the Annex of the REMIT Implementing Regulation. Only records describing secondary allocation can be executed outside OMP.

Files containing one or more transaction records related to the transportation contracts are submitted to ACER by a RRM. The RRM sending the information is identified based on the user (name) who submits the file, which uniquely identifies the RRM. For transaction records related to transportation contracts, the code of the RRM that sends the file should also populate Table 3 Data Field No (4) Sender identification or Table 4 Data Field No (1) Sender Identification.

The MP in the 'RRM-MP-contracts outside OMP' data cluster is conceptually the MP which receives the capacity. For transaction records describing secondary allocation bids and/or the transfer of rights, the MP is identified using Table 3 Data Field No (36) Transferee party or one of the following two Table 4 fields: Table 4 Data Field No (27) Market participant or Data Field No (37) Transferee identification. The latter is only used when Table 4 Data Field No (27) Market participant is left empty.

For records referring to an 'outside OMP' contract, the corresponding 'RRM-MP-contracts outside OMP' data cluster is identified as follows:

- Table 3: Currently, no information on the OMP is available. As a result, all reported records are attributed to a single fictitious OMP and therefore assigned to the 'RRM-MP-OMP records' data cluster. In the future, the Table 3 schema is expected to be updated to include OMP information; this section will be revised accordingly at that time.
- Table 4: The relevant data is provided in Data Field No (2) Organised Market Place Identification. If the reported code is not recognised as an OMP, the record is attributed to the 'RRM-MP-contract outside OMP' data cluster.

11. Transaction records describing a transaction related to contracts for the supply of electricity and natural gas executed outside an OMP

11.1 Can a transaction record be attributed to the 'RRM-MP-contracts outside OMP' data cluster based on Table 1 Data Field No (8) Beneficiary ID or Table 2 Data Field No (7) Beneficiary ID, considering that another MP may be a beneficiary of the trade?

Yes, the MP in the 'RRM-MP-contracts outside OMP' data cluster is identified by using either Table 1 Data Field No (8) Beneficiary ID or Table 2 Data Field No (7) Beneficiary ID if the field is reported.

11.2 When grouping transaction records into the 'RRM-MP-contracts outside OMP' data cluster, are Table 1 records (XBIL, Executions) distinguished from Table 2 records?

No, all transaction records reported by the same RRM on behalf of the same MP, regardless of whether they are reported using Table 1 or Table 2 reporting fields, will belong to the same 'RRM-MP-contracts outside OMP' data cluster.

11.3 Treatment of MPs belonging to the same group

See reply in Chapter 4: Transaction records-based fee component and its correction amount, question '9.7 Treatment of MPs belonging to the same group'.

11.4 Counting of transaction records which were reported with an invalid RRM code [Table 2 Data Field No (5) Reporting entity ID]

Transaction records reported with an invalid RRM code are not considered for the REMIT fee calculation, given that such transaction records are rejected before entering into the ARIS database.

11.5 Counting of transaction records which were reported with an invalid MP code [either reported using Table 1 or Table 2 Data Field No (1) ID of the market participant or counterparty or Table 1 Data Field No (8) Beneficiary ID or Table 2 (7) Beneficiary ID]

Transaction records reported with an invalid MP code, i.e. a code not found in CEREMP, are considered for the fee calculation. Even though an invalid MP code may trigger validation rules, such transaction records still enter into the ARIS database. Each invalid MP code forms a separate 'RRM-MP-contracts outside OMP' data cluster. In a case where several transaction records are reported with the same invalid MP code, all such transaction records belong to the same data cluster.

If an MP reports records with an MP code, which is at the time of submission not registered in CEREMP, the record will be inserted in ARIS as invalid. However, if the MP registers such code later during the year and if it is assigned to a single MP in CEREMP on 1 January of the year following the year of the records submission, records with the code registered after the time of submission are assigned to the 'RRM-MP-contracts outside OMP' data cluster of the MP to which the code belongs.

If the MP code is assigned to more than one MP, records with such MP code forms a separate 'RRM-MP-contracts outside OMP' data cluster.

If an MP needs to change the ACER code (e.g. due to a technical issue), records reported with the old ACER code may be grouped together with the new ACER code based on the request sent by the RRM.

After Brexit, a UK MP was able to re-register with another EU-27 NRA to obtain a new EU-27 ACER code. RRM's were able to report lifecycle events with the old UK ACER codes using a parallel channel until the end of 2021. Records reported with the old UK ACER codes were grouped with the associated new EU-27 ACER codes if the re-registered MPs reported the previous UK ACER codes in CEREMP. ACER informed the RRM's in 2020 that for any lifecycle events occurring in 2022, MPs would have to novate the trades and report them via a regular channel. Therefore, for fees charged in January 2024 or later, such grouping will no longer be done, as all trades should have been novated in 2022.

11.6 Counting of transaction records reported with a non-accepted delivery point or zone code [reported using either Table 1 Data Field No (48) Delivery point or zone or Table 2 Data Field No (41) Delivery point or zone]

Transaction records reported with a non-accepted delivery point or zone code are considered for the fee calculation. Even though the reporting of a non-accepted delivery point or zone code triggers validation rules, such transaction records still enter into the ARIS database.

The delivery point or zone is not part of the grouping, which means that the reporting of invalid codes has no impact on the formation of the 'contracts outside OMP' data cluster. Transaction records where the delivery point or zone is not accepted will be counted to the 'contracts outside OMP' data cluster in the same manner as transaction records reported with an accepted delivery point or zone code.

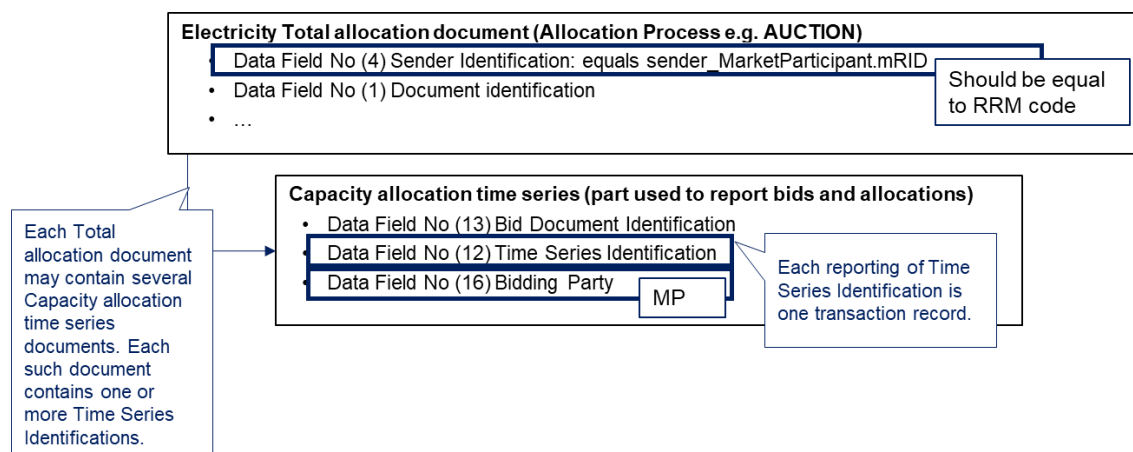
12. Transaction records related to the transportation contracts grouped into 'RRM-MP-OMP' data cluster or into 'RRM-MP-contracts outside OMP' data cluster

12.1 Counting of transaction records describing primary allocation of electricity transportation capacity

ACER has identified that all data related to primary allocation of electricity transportation capacity have been reported by RRM's using the Total allocation schema. ACER assumes such reporting will also be used going forward; in case of changes in the reporting behaviour, ACER will also adjust the way of counting transaction records describing primary allocation of electricity transportation capacity.

The number of transaction records is based on Data Field No (12) Time series identification. In case the same time series identifier is reported multiple times, it is counted multiple times. In case the same time series identifier is included in more documents (either different documents or multiple versions of the same document), it will be counted multiple times.

Figure 1: Illustration of transaction records counting for primary allocation of electricity transportation capacity

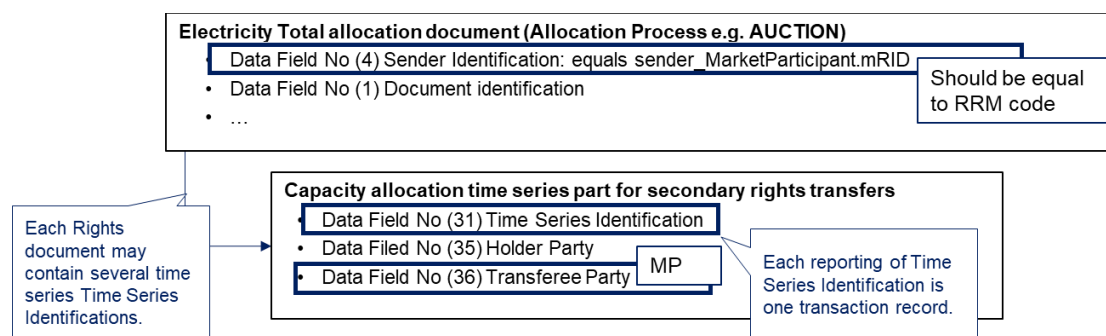


12.2 Counting of transaction records describing secondary allocation of electricity rights

Data for secondary allocation of electricity transportation capacity are reported using the Rights schema.

The number of transaction records is based on Data Field No (31) Time series identification. In case the same time series identifier is reported multiple times, it is counted multiple times. In case the same time series identifier is included in more documents (either different document or multiple versions of the same document), it will be counted multiple times.

Figure 2: Illustration of transaction records counting for secondary allocation of electricity transportation capacity



12.3 Are transaction records related to auctions for primary allocation of electricity rights, where no bids were submitted, counted towards fees?

Transaction records referring to 'no-bid auctions' are not counted towards fees.

12.4 Counting of transaction records containing invalid codes in any of the following Table 3 fields: Data Field No (16) Bidding party, Data Field No (35) Rights holder party, Data Field No (36) Transferee party, Data Field No (54) Subject party

Transaction records which contain invalid codes in one or more of the fields listed in the question are counted for the purpose of the fee calculation.

If the code is wrongly reported in Data Field No (16) Bidding party or Data Field No (36) Transferee party or is not registered in CEREMP, such code corresponds to a specific unidentifiable MP and a transaction record with such wrongly inserted code becomes a part of a separate 'RRM – MP transportation records' data cluster.

However, if the MP registers such code in CEREMP later during the year and if it is assigned to a single MP in CEREMP on 1 January of the year following the year of the records submission, records with the code registered after the time of submission are assigned to the data cluster of the MP to which the code belongs.

If the reported MP code is registered by more than one MP, records with such MP code forms a separate data cluster.

If the code is not reported in Data Field No (16) Bidding party or Data Field No (36) Transferee party, such records are inserted in ARIS as valid. For the REMIT fee purposes all such records form a separate 'RRM – MP transportation records' data cluster.

If the code is wrongly reported or not reported in Data Field No (35) Rights holder party or Data Field No (54) Subject party, this does not affect the formation of the data cluster and therefore has no impact on the fee calculation.

12.5 Counting of transaction records reported with non-Accepted delivery point or zone code [reported in Table 3 Data Field No (10) Domain, Table 3 Data Field No (19) In area, Table 3 Data Field No (20) Out area or Table 4 Data Field No (22) Network point identification]

Transportation transaction records reported with non-accepted delivery point or zone will be considered in the fee calculation, as such records are currently always inserted into the ARIS database.

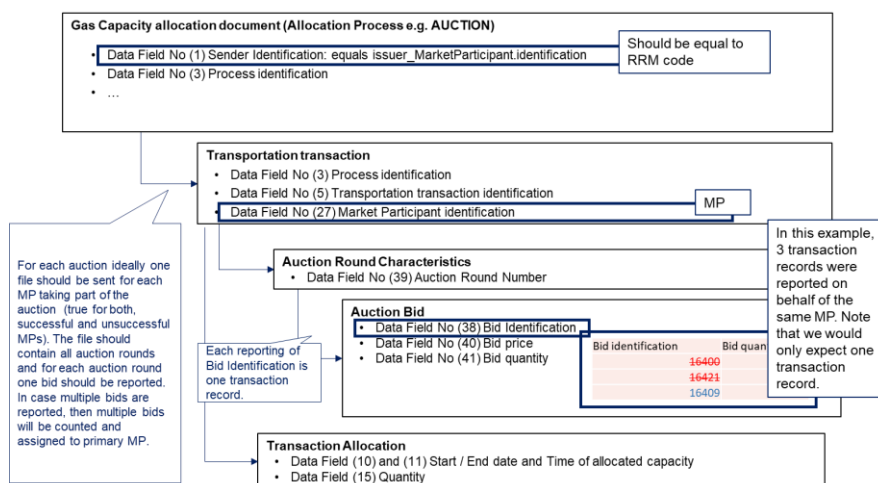
12.6 Counting of transaction records describing primary allocation of gas transportation capacity

Transaction records describing primary allocation of gas transportation capacity are reported to ACER using the Edig@s 'Gas Capacity Allocation Document'.

If the capacity was allocated via auction, transaction records describing primary allocation of gas transportation capacity are counted based on the number of reported bids (Table 4 Data Field No (38) Bid ID). In case the same bid identifier is reported multiple times, it is counted multiple times. In case the same bid identifier is included in more documents (either different document or multiple versions of the same document), it will be counted multiple times.

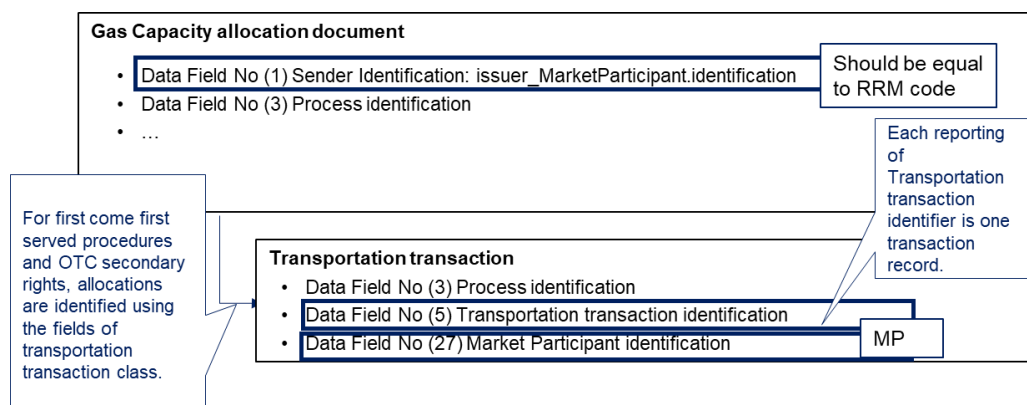
All the bids sent in one file are linked to the MP reported in Data Field No (27) Primary Market Participant Identification.

Figure 3: Illustration of transaction records counting for primary allocation of gas transportation capacity if the capacity has been allocated via auction. Same counting applies also in case secondary allocation of capacity is done using bids.



In case the allocation is allocated via a first come-first-served procedure, then transaction records describing primary allocation of gas transportation capacity are counted based on Table 4 Data Field No (5) Transportation transaction identification. If the same identification number is reported multiple times, it is counted multiple times. If the same identification number is included in more documents (either different documents or multiple versions of the same document), it will be counted multiple times.

Figure 4: Illustration of transaction records counting for primary allocation of gas transportation capacity if the capacity has been allocated via a first-come-first-served procedure. Same counting applies in case of 'pure OTC' secondary allocation transactions.



12.7 Counting of transaction records describing secondary allocation of gas rights

Transaction records describing primary allocation of gas transportation capacity are reported to ACER using the Edig@s 'Gas Capacity Allocation Document'.

The counting of transaction records describing secondary allocation of gas rights depends on the type of trading procedure used to transfer or assign the capacity.

In case a transaction record is reported with bids (for example, through Call for Orders procedure), then one transaction record equals one reported bid (Table 4 Data Field No (38) Bid ID). In case the same bid identifier is reported multiple times, it is counted multiple times. In case the same bid identifier is included in more documents (either different documents or multiple versions of the same document), it will be counted multiple times. Please also refer to Figure 3 above.

In case a transaction record is pure over the counter trade, then one transaction record equals one reported identifier in Table 4 Data Field No (5) Transportation transaction identification. If the same identification number is reported multiple times, it is counted multiple times. In case the same identification number is included in more documents (either different documents or multiple versions of the same document), it will be counted multiple times. Please also refer to Figure 4 above.

12.8 Are transaction records related to auctions for primary allocation of gas rights, where no MP participated in the auction, attributed to any data cluster?

Transaction records describing auctions where no MP participated are not included in any data cluster.

12.9 Counting of transaction records with invalid code reported in any of the following Table 4 fields: Data Field No (25) TSO1 identification, Data Field No (26) TSO2 identification, Data Field No (27) Primary Market Participant Identification, Data Field No (36) Transferor identification, Data Field No (37) Transferee identification

Transaction records which contain invalid codes in one or more of the fields listed in the question are counted for the purpose of the fee calculation.

If the code is wrongly reported in the Data Field No (27) Primary Market Participant Identification or Data Field No (37) Transferee Identification or is not registered in CEREMP, such code corresponds to a specific unidentifiable MP and a transaction record with such wrongly inserted code becomes a part of a separate data cluster.

However, if the MP registers such code in CEREMP later during the year and if it is assigned to a single MP in CEREMP on 1 January of the year following the year of the records submission, records with the code registered after the time of submission are assigned to the data cluster of the MP to which the code belongs.

If the reported MP code is registered by more than one MP, records with such MP code forms a separate data cluster.

If the code is not reported in Data Field No (16) Bidding party or Data Field No (36) Transferee party, such records are inserted in ARIS as valid. For the REMIT fee purposes all such records form a separate data cluster.

If the code is wrongly reported or not reported in Data Field No (25) TSO1 identification, Data Field No (26) TSO2 identification or Data Field No (36) Transferor identification, this does not affect the formation of a new data cluster and therefore has no impact on the fee.

12.10 Counting of transaction records reported with non-Accepted delivery point or zone code [reported in Table 3 Data Field No (10) Domain, Table 3 Data Field No (19) In area, Table 3 Data Field No (20) Out area or Table 4 Data Field No (22) Network point identification]

Transportation transaction records reported with non-Accepted delivery point or zone will be considered in the fee calculation, as such records are currently always inserted into ARIS database.

CHAPTER 5: EXPOSURE REPORT-BASED FEE COMPONENT AND ITS CORRECTION AMOUNT

This chapter will be provided in the subsequent version of the Q&A to cover the obligation of reporting exposures.

CHAPTER 6: SURCHARGE FEES IN 2025

1. What is the purpose of surcharge fees?

For ACER to cover the costs of its REMIT tasks in 2025, it is necessary to levy a surcharge amounting to the difference between the expected revenues from fees as budgeted in ACER's Programming Document for 2025-2027 and the sum of the amounts already invoiced in 2025. The difference amounts to EUR 7.6 million.

The surcharge should be calculated in a straightforward way, enabling RRM to easily identify how the different market participants, on whose behalf they report data, impact the invoiced surcharge. Therefore, the surcharge should depend on the number of market participants a RRM reports transaction records for. In case a market participant reports data via more than one RRM, this market participant would nevertheless be considered for each RRM when calculating the surcharge. Since the surcharge may have an impact on the charges paid by a market participants to a RRM, market participants which ceased to be market participants earlier in 2025 should not be considered when calculating the surcharge.

2. How are the surcharge fees calculated?

The total surcharge fee for 2025 amounts to EUR 7.6 million, representing the deficit under the approved budget and the collection of REMIT fees through the debit notes issued at the beginning of 2025.

The surcharge is calculated based on the proportion of MPs reported by each RRM during the first half of 2025 (up to 30 June) relative to the total number of MPs reported across all RRMs. If a single market participant is reported through multiple RRMs, it is counted multiple times toward the total number of market participants. The resulting proportion for each RRM is then multiplied by the deficit amount of EUR 7.6 million. Only MPs that were registered in accordance with Article 9 of Regulation (EU) No 1227/2011 as of 30 June 2025 should be considered.

Based on the ACER's calculation, the amount per MP that RRMs will have to pay, equals EUR 467.17.

3. When will RRMs receive the debit notes for the surcharge fees and when the RRMs will have to pay?

ACER has to send the debit note for a surcharge in 2025 to the RRMs within 2 weeks from entry into force of Commission Decision (EU) 2025/1771 to be paid within four weeks. The entry into force of the Decision was on 14 September 2025. ACER sent the debit notes on 24 September 2025. If the surcharge exceeds EUR 250,000, RRMs may settle the excess amount by 31 January 2026.

4. Are there any RRMs that are exempt from the surcharge fees?

Yes, the RRMs that terminated or announced their termination in 2025 before the adoption of the Commission Decision (EU) 2025/1771 are exempt from the surcharge fees.

5. Is there a safeguard, condition or limit on how the RRMs will pass the fee onto the MPs?

The charging of the REMIT fee between an RRM and their MPs depends on the individual reporting arrangements between them. ACER has no mandate to monitor how RRMs pass the fees onto MPs or, more generally, to monitor the fees charged by RRMs to MPs.

RRMs may apply a different cost recovery scheme towards MPs, including for instance flat-rate or pro-rata approaches. ACER considers this to be in the domain of the RRM-MP bilateral arrangements.

6. What happens if an MP does not pay the ACER REMIT fee to the RRM at all or on time?

Payment discipline and its enforcement is part of the individual reporting arrangements between RRM and MPs.

Terminology and abbreviations

1. List of regulations

ACER Regulation	Regulation (EU) 2019/942 of the European Parliament and of the Council establishing a European Union Agency for the Cooperation of Energy Regulators
REMIT	Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency
REMIT Implementing Regulation	Commission Implementing Regulation (EU) No 1348/2014 on data reporting implementing Article 8(2) and Article 8(6) of REMIT
REMIT Fee Decision	Commission decision (EU) 2025/1771 of 8 September 2025 on fees due to the European Union Agency for the Cooperation of Energy Regulators for its tasks under Regulation (EU) No 1227/2011 of the European Parliament and of the Council and repealing Commission Decision (EU) 2020/2152

2. List of abbreviations

ACER/Agency	European Union Agency for the Cooperation of Energy Regulators
ARIS	Agency's REMIT Information System
RRM	Registered reporting mechanism
OMP	Organised market place
MP	Market participant
WEP	Wholesale energy product
CEREMP	Centralised European Register of Energy Market Participants
IIP	Inside Information Platform

3. List of terms

Bilateral contract	A contract agreed between two market participants (MPs) outside organised markets. All non-standard contracts (REMIT Table 2) are bilateral contracts. Important: bilateral contract trades may also be reported using REMIT Table 1 as long as they are done with standard-contracts. However, there are no associated orders for bilateral trades.
Contract	A contract is a specific tradable instrument that allows a market participant to trade a product. Transactions (including orders) can only occur on the basis of a contract. There can be multiple contracts for a single product. An example of a contract is 'Forward contract for electricity delivered in France during 2021, baseload, offered at broker TFS and named FR21 with contract ID 123'.
Inside Information Platform (IIP)	Inside information platform means a person authorised pursuant to the REMIT and to the Delegated Act on authorisation, supervision, withdrawal and orderly substitution of IIPs and RRM's under REMIT to provide the service of operating a platform for the disclosure of inside information and for the reporting of disclosed inside information to ACER on behalf of market participants.
Market participant (MP)	Market participants are parties that enter into transactions that need to be reported to ACER under REMIT. MPs shall register with the national regulatory authority (NRA) in the Member State in which they are established or resident or, if they are not established or resident in the Union, in the Member State in which they are active.

Non-standard contract	According to Article 2 of Commission Implementing Regulation (EU) 1348/2014, it means a contract concerning any wholesale energy product that is not a standard contract.
Non-standard contract execution	The execution of a non-standard contract is reported using Table 1. The execution is a bilateral trade record referring to an existing non-standard contract (can be considered as a framework contract).
Organised market place (OMP)	A broker platform or an exchange where standard contracts are offered for trading. All OMPs are listed on the List of Organised Market places, which is available on the REMIT Portal and published according to Article(3) of the REMIT Implementing Regulation.
Registered Reporting Mechanism (RRM)	Registered reporting mechanisms are market participants or entities reporting on behalf of market participants which fulfil the technical and organisational requirements for the reporting of data to ensure the efficient, effective and safe exchange and handling of information for the purpose of reporting information pursuant to Article 8 of REMIT in accordance with Article 11 of the REMIT Implementing Regulation.
RRM requirements	Requirements pursuant to Article 11 of the REMIT Implementing Regulation detailing requirements to be met by entities wishing to become RRM.
Standard contract	According to Article 2 of the REMIT Implementing Regulation, it means a contract concerning a wholesale energy product admitted to trading at an organised market place, irrespective of whether or not the transaction actually takes place on that market place.
Transaction record	An individual data set containing the details of a trade, order to trade or contract, or containing lifecycle information such as modifications, early terminations or corrections of trades, order to trades or contracts, which is reported to ACER pursuant to Article 3 of the REMIT Implementing Regulation.
Transportation contract	A contract agreed between two market participants to trade transmission capacity.
Table 1, Table 2, Table 3, Table 4	Different data formats for the reporting of transactions reportable to ACER under Article (8) of REMIT as defined in the REMIT Implementing regulation.
Wholesale Energy Product	Wholesale energy product are products as defined in Article 2(4) of REMIT.