ACER
European Union Agency for the Cooperation of Energy Regulators

Outcome of the consultation on the updated Transaction Reporting User Manual (TRUM) and its Annexes

2023/2024

13 March 2024

1. Background

Between late 2023 and early 2024, ACER carried out a consultation on the updated version of the Transaction Reporting User Manual (TRUM v6.0) and its Annexes, including:

- Annex II v5.0: Trading scenarios for the purpose of REMIT data reporting;
- Annex IV v2.2: Guidance on UTI generation;
- Annex VI v3.0: Additional information on how to correctly report the Delivery point or zone;
- [NEW] Annex VIII v1.0: Guidance on reporting LNG supply contracts under REMIT.

The consultation ran between late October 2023 and February 2024 and included the participation of relevant REMIT stakeholders, such as associations of energy market participants (AEMPs), organised market places (OMPs) and registered reporting mechanisms (RRMs). As part of the consultation, ACER also organised in November 2023 its online roundtable meetings on REMIT transaction reporting to facilitate the exchange of views on the relevant transaction reporting topics with the involved stakeholders.

The consultation was carried out pursuant to Article 5(2) of Commission Implementing Regulation (EU) No 1348/2014 ('the REMIT Implementing Regulation').

The amendments introduced in the updated **TRUM** mainly focus on providing guidance on the reporting of transactions related to liquified natural gas (LNG) and Power Purchase Agreements (PPAs), and on improving the reporting of total notional contract quantity and the index value in Table 1 and Table 2.

In order to accommodate the proposals of stakeholders provided during the consultation, the updated TRUM introduces new contract types applicable for the reporting of standard and non-standard contracts related to PPAs and LNG. In addition, 'LNG' has been introduced as a new energy commodity applicable for contracts related to LNG.

With regard to the newly introduced accepted values for the energy commodity and contract type data fields, reporting parties shall bear in mind that these require the update of the list of accepted values of the relevant fields in the REMITTable1 and REMITTable2 electronic formats. Thus, the reporting of the new values will be possible only after ACER and RRMs carry out the necessary changes and technical implementation. In order to ensure a smooth and timely technical implementation of the introduced changes, ACER will coordinate with the RRMs through the established channels and will inform reporting parties in due time about the timeline for the go-live of the reporting of the new values in the electronic formats.

In addition, **Annex II v5.0 provides** new examples of spot-type LNG transactions and non-standard contracts on reliability options.

Annex IV v2.2 provides additional clarification on the reporting of the Unique Transaction Identifier (UTI) and Contract ID in relation to transactions concluded bilaterally.

In **Annex VI v3.0** references to concluded, and therefore discontinued, exercises were removed.

The new Annex VIII defines the different types of contracts typical for LNG trading and how to report them. This Annex is based on previously consulted FAQs and Annex II examples related to LNG transactions, including clarifications proposed by stakeholders.

Moreover, references to the REMITTable1_V1 and REMITTable1_V2 electronic formats were removed from the guidance documents due to their recent retirement.

The drafts of the above-mentioned updated documents were shared with the relevant stakeholder groups for consultation in two rounds: in October 2023 and in January 2024. The feedback received from stakeholders during the first consultation round was presented and discussed at the November 2023 roundtable meeting.

Eight stakeholders provided feedback during the first round of consultation and seven provided additional input during the second round. All these comments – duly anonymised – are reported below, together with the relevant responses from ACER.

2. LIST OF COMMENTS RECEIVED ON THE UPDATED TRUM V6.0

2.1 Chapter 4 of the TRUM: Reporting of transactions related to standard supply contracts

Data Field (17) Minimum execution volume

First draft	The data field has been updated by indicating that the minimum execution volume of the order shall be expressed in the same unit of measurement in which the quantity or energy volume (delivery capacity) for the contract (reported in Data Field (40)) has been expressed, i.e. same unit of measurement as reported in Data Field (42).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (19) Undisclosed volume

First draft	The data field has been updated by indicating that the undisclosed volume of the order shall be expressed in the same unit of measurement in which the quantity or energy volume (delivery capacity) for the contract (reported in Data Field (40)) has been expressed, i.e., same unit of measurement as reported in Data Field (42).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (21) Contract ID

First draft	The first draft of the updated TRUM and the new Annex VIII proposed that for contracts related to LNG, the Contract ID shall start with string 'LNG_' followed by the contract ID provided by the OMP.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefix methods in the Contract ID field, as they add complexity to the UTI algorithm. Instead, they preferred to include this information in Data field (24) Energy commodity and Data field (23) Contract type by updating the accepted values.
Second draft	Based on stakeholders' negative feedback, the original proposal of adding a prefix to the Contract ID field has been withdrawn. Instead, the list of accepted values for Data field (23) Contract type and Data field (24) Energy commodity has been updated in order to flag transactions related to LNG.

Outcome	The final version of the document did not include any changes to Data field (21).

Data Field (22) Contract name

First draft	The first draft of the updated TRUM and the new Annex VIII proposed that for contracts related to LNG, the contract name shall start with string 'LNG_' followed by the contract name provided by the OMP.
Stakeholder feedback	Stakeholders indicated that it was questionable that information that has already been provided needs to be repeated in different reporting fields.
Second draft	Based on stakeholders' negative feedback, the original proposal of adding a prefix to the Contract name field has been withdrawn. Instead, the list of accepted values for Data field (23) Contract type and Data field (24) Energy commodity has been updated in order to flag transactions related to LNG.
Outcome	The final version of the document did not include any changes to Data field (22).

Data Field (23) Contract type

First draft	The first draft of the updated TRUM did not propose any updates in Data field (23).
Second draft	Based on the stakeholders' unfavourable opinion on the updates proposed by the first draft for field (21), (22) and (31) with regard to the LNG transactions (see above), the list of accepted values for Data field (23) Contract type has been updated in order to flag transactions related to LNG (including also reference to the delivery terms in the contract type) as proposed by stakeholders. In addition, in the draft version of the 16th edition of the FAQ document ACER had a similar proposal for PPAs (using prefixes in the Contract ID/UTI fields and applying the Extra fields in order to flag PPAs). As stakeholders expressed similar concerns for this proposal, it was withdrawn during the second round of consultation. Instead, similarly to LNG transactions, the list of accepted values for Data field (23) Contract type has been updated in order to flag transactions related to PPAs as proposed by stakeholders.
Outcome	The second version of the draft proposal has been accepted by stakeholders. In addition, the stakeholders' proposal to publish the newly introduced accepted values for contract type data field in all related documents as part of the current publication of the guidance documents (i.e. TRUM v6.0 and its annexes) without waiting until the conclusion of the technical implementation has been also accepted. Stakeholders indicated that MPs need to have certainty about the changes and this certainty for MPs is granted only by the official version of the TRUM. Therefore, the go-live of the changes could be only a minimum of six months after the updated TRUM publication in order to allow MPs to perform the necessary technical implementation.

Data Field (24) Energy commodity

First draft	The first draft of the updated TRUM did not propose any updates in Data field (24).
Second draft	Based on the stakeholders' unfavourable opinion on the updates proposed by the first draft for field (21), (22) and (31) with regard to the LNG transactions (see above), the list of accepted values for Data field (24) Energy commodity has been updated by including

	an additional commodity value 'LG' for 'Liquified natural gas' in order to flag transactions related to LNG as proposed by stakeholders.
Outcome	The second version of the draft proposal has been accepted by stakeholders. In addition, the stakeholders' proposal to publish the newly introduced accepted value for field (24) in all related documents as part of the current publication of the guidance documents (i.e. TRUM v6.0 and its annexes) without waiting until the conclusion of the technical implementation has been also accepted. Stakeholders indicated that MPs need to have certainty about the changes and this certainty for MPs is granted only by the official version of the TRUM. Therefore, the go-live of the changes could only be a minimum of six months after the updated TRUM publication in order to allow MPs to perform the necessary technical implementation.

Data Field (31) Unique transaction ID

First draft	The description of the data field has been updated as follows: *In order to facilitate the reporting of bilateral contracts, the Agency has developed and published an ACER algorithm which enables market participants to generate the same UTI from the economic terms of the bilateral trade.* The deletion of the reference to the communication between the two market participants ("*without any communication between the two market participants involved")* has been carried out in accordance with the similar update introduced in the updated Annex IV.
Outcome	The proposal of the first draft was accepted.

Data Field (36) Index value

First draft	The first draft included a clarification on the reporting of the index value by specifying the scenarios when there is no difference from the fixing index price and when there is an agreed difference.
Stakeholder feedback	In their feedback, stakeholders indicated that it could be misleading to populate the same field both with a public value of an index and the differential from such an index. Moreover, they did not see the added value in reporting a value that is publicly available, also considering the effort necessary to implement. Some stakeholders also indicated that there should always be a value (not a blank field when there is value 0).
Outcome	Even though the stakeholders' comments were acknowledged, the proposed amendments were carried out in order to fulfil the purpose of Data field (36): 'the index value represents the value of the index at the time the contract was traded'. The proposal of the first draft was accepted with no further comments from stakeholders.

Data Field (38) Notional amount

First draft	The first draft included a clarification indicating that in some cases (e.g. trade at settlement), reporting parties may be able to calculate the notional amount of the trade and populate field (38) by the time the REMIT reporting of the trade is due. This piece of information always provides an added value to the transaction record.
Stakeholder feedback	No feedback was received.

Outcome	The proposal of the first draft was accepted.

Data Field (39) Notional currency

First draft	The first draft proposed to update the list of accepted values applicable for field (39) by removing 'HRK' for 'Croatian kuna'.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (41) Total notional contract quantity

First draft	The first draft proposed to update the cardinality of field (41) by flagging it as conditionally mandatory for orders to trade. The field was previously not applicable for orders to trade.
Stakeholder feedback	Stakeholders raised the question of whether field (41) can be populated with zero quantity for Executions, specifying that market participants would like to submit the executions for Table 2 contracts as zero reports to make it clear that they have not forgotten to report in a given month. In addition, stakeholders indicated that they are specifically interested in looking for spread examples. The XML does not appear to be conducive to the nuances of notional quantity on spreads (for example representing a 30-day month against a 31-day month). Stakeholders have also raised some concerns on how to populate the field for spreads and strategy orders, for instance, where there is more than one leg, and where the total notional contract quantity value differs per leg given the type of strategy employed.
Outcome	The proposal of the first draft was considered as final. Stakeholders' concerns have been addressed as follows: • For Executions, the field (41) shall represent total quantity that has been delivered under the individual Execution. If in that specific month there is no execution of the Table 2 non-standard contract, there is no need to submit an Execution report indicating zero in this field. • The schema field seems to be fit to capture the nuances of notional quantity on spreads. Nevertheless, when RRMs carry out the technical implementation of the proposed update in their IT system, their feedback would be appreciated in this regard. • Regarding the reporting of the total notional contract quantity value for spreads, reporting parties may refer to the XML trade examples available on the ACER website (REMIT Documents section). However, in case stakeholders observe that the examples might not be fully aligned with the latest guidance provided in TRUM v6.0., they are invited to use the online REMIT Query Form to seek guidance on the technical implementation and raise further business questions on the population of the total notional contract quantity value for orders.

2.2 Chapter 5 of the TRUM: Reporting of non-standard contracts

Data Field (11) Contract ID

First draft	The first draft of the updated TRUM and the new Annex VIII proposed that for contracts related to LNG and PPAs, the Contract ID shall start with the string 'LNG_' or 'PPA_' respectively, followed by the contract ID as assigned by the two market participants.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefix methods on the Contract ID field, as they add complexity to the UTI algorithm. Instead, they preferred to include this information in Data field (14) Energy commodity adding a new value 'LNG' to the existing ones, NG and EL.
Second draft	Based on the stakeholders' negative feedback to the first proposal, the list of accepted values for Data field (13) Contract type has been updated in order to flag transactions related to LNG. Consequently, the original proposal of adding a prefix to the Contract ID in field (11) has been withdrawn.
Outcome	The second version of the draft proposal has been accepted by stakeholders. As a result, no change has been introduced in field (11). By accepting the stakeholders' proposal, as an alternative solution, Data field (13) Contract type and Data field (14) Energy commodity have been updated in order to flag non-standard contracts related to LNG and PPAs.

Data Field (13) Contract type

First draft	The first draft of the updated TRUM did not propose any updates specifically for field (13).
Second draft	Based on the stakeholders' unfavourable opinion on the updates proposed by the first draft for field (11) with regard to the prefix for contracts related to LNG and PPA (see above), the list of accepted values for Data field (23) Contract type has been updated in order to flag transactions related to LNG (including also reference to the delivery terms in the contract type) as proposed by stakeholders. In addition, in the draft version of the 16th edition of the FAQ document ACER had a similar proposal for PPAs (using prefixes in the Contract ID/UTI fields and applying the Extra fields in order to flag PPAs). Since stakeholders expressed similar concerns on this proposal, the proposal was withdrawn during the second round of consultation. Instead, similarly to LNG transactions, the list of accepted values for Data field (23) Contract type has been updated in order to flag transactions related to PPAs, as proposed by stakeholders.
Outcome	The second version of the draft proposal has been accepted by stakeholders. In addition, the stakeholders' proposal to publish the newly introduced accepted values for contract type data field in all related documents as part of the current publication of the guidance documents (i.e. TRUM v6.0 and its annexes) without waiting until the conclusion of the technical implementation has been also accepted. Stakeholders indicated that MPs need to have certainty about the changes and this certainty for MPs is granted only by the official version of the TRUM. Therefore, the go-live of the changes could be only a minimum of six months after the updated TRUM publication in order to allow MPs to perform the necessary technical implementation.

Data Field (24) Energy commodity

First draft	The first draft of the updated TRUM did not propose any updates in field (24).
Second draft	Based on the stakeholders' unfavourable opinion on the updates proposed by the first draft for field (21), (22) and (31) with regard to the LNG transactions (see above), the list of accepted values for Data field (24) Energy commodity has been updated by including an additional commodity value 'LG' for 'Liquified natural gas' in order to flag transactions related to LNG, as proposed by stakeholders.
Outcome	The second version of the draft proposal has been accepted by stakeholders. In addition, stakeholders' proposal to publish the newly introduced accepted value for field (24) in all related documents as part of the current publication of the guidance documents (i.e. TRUM v6.0 and its annexes) without waiting until the conclusion of the technical implementation has been also accepted. Stakeholders indicated that MPs need to have certainty about the changes and this certainty for MPs is granted only by the official version of the TRUM. Therefore, the go-live of the changes could be only a minimum of six months after the updated TRUM publication in order to allow MPs to perform the necessary technical implementation.

Data Field (15) Price or price formula

First draft	The first draft of the updated document included a clarification in this data field that a clear reference to the index (indices) is expected to be indicated in this field by specifying the fixed and variable components with reference to the index or indices reported in field (25).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (16) Estimated notional amount

First draft	The first draft of the updated document included the following clarification: 'The Agency understands that without a fixed price and/or quantity, market participants will only be able to provide an estimated notional amount. The rest of the sentence which said that "[the estimated notional amount] *may differ between the two counterparties*" has been deleted.
Stakeholder feedback	No feedback was received.
Outcome	The proposal provided in the first draft was accepted.

Data Field (17) Notional currency

First draft	The first draft proposed to update the list of accepted values applicable for field (17) by removing 'HRK' for 'Croatian kuna'.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (18) Total notional contract quantity

First draft	The first draft of the updated document included the following clarification: In case the two elements of the formula for the calculation of the total notional contract quantity (TNCQ) are defined/known by the contract (especially if the volume classification of the capacity is indicated as 'F' for 'Fix' in Data Field (21) Volume optionality), reporting parties are expected to perform the calculation of the TNCQ of the contract and report it in Data Field (18). The Agency understands that without a defined quantity market participants will be only able to provide an estimated notional contract quantity, e.g. in case when the volume optionality is indicated as Min/Max in Data Field (21). Where the total notional contract quantity is not known, this field may be left blank. This scenario may be applicable primarily when the volume optionality is indicated as Complex or Variable in Data Field (21). Nevertheless, providing an estimated TNCQ in these scenarios always gives an added value to the transaction report.
Stakeholder feedback	With respect to the indication to provide an estimated value for the total notional quantity, even if the volume optionality is not defined (e.g. min-max), stakeholders indicated that the proposed approach could result in inconsistency of the reported value for the total notional quantity by the two counterparties for bilateral transactions. Furthermore, the proposed approach rises doubts on the opportunity to provide an estimated value for this data field when the volume optionality is significantly variable, because the estimated value could be significantly different from the final value.
Outcome	The proposal provided in the first draft was accepted. Stakeholders should note that the currently published text of the TRUM includes the indication to provide an estimated TNCQ in this field. It is understood that counterparties to the contracts possess the information on the features of their contract, therefore shall be in the position to provide a best estimation based on their assessment. Therefore, it is not considered appropriate to provide a methodology for calculation by the guidance.

Data Field (25) Fixing index

First draft	The first draft of the updated document proposed to clarify that the source of the fixing index/indexes reported in this field shall be indicated in Data field (27) Fixing index sources.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

2.3 Chapter 7 Reporting of gas transportation contracts

Data Field (1) Sender identification

First draft	The first draft of the updated document proposed to clarify that field (1) indicates the identification of the owner and/or sender of the document.
Stakeholder feedback	A stakeholder indicated that both the existing and the adjusted regulations are misleading. It is not clear which ID should be used if owner and sender are not identical. In Data Field (1) Sender identification it is already defined that the unique identification code identifies the party that is the 'owner' of the information being transmitted in the document and is responsible for its content. The stakeholder argued that for each data set, only the unique identification code of the owner should be used.
Outcome	The proposal of the first draft was accepted. The proposed amendment was needed to address scenarios where the sender is not the same as the owner of the document.

Data Field (18) Total price

First draft	The first draft of the updated document proposed to clarify the scenario in the extra guidance box, which relates to zero reserve price instead of *null* reserve price.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (20) Reserve price

First draft	The first draft of the updated document proposed to clarify that the price reported in this field expressed in the currency reported in Data Field (17) shall be expressed per unit of measurement as indicated in Data Field (16).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (21) Premium price

First draft	The first draft of the updated document proposed to clarify that the price reported in this field expressed in the currency reported in Data Field (17) shall be expressed per unit of measurement as indicated in Data Field (16).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Data Field (28) Balancing group or portfolio code

First draft	The first draft of the updated document proposed to clarify the meaning of internal account: internal account (i.e. identification) of the shipper or the balancing group account (i.e. identification) assigned by the responsible TSO (identified in Data Field (25) TSO 1 Identification).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

3. LIST OF COMMENTS RECEIVED ON THE UPDATED ANNEX II

3.1 Examples related to auction contracts

Example 1.10 Electricity hourly block (with 'step' order)

First draft	In the example, the signs for the quantity values in the Delivery Capacity and Price/time interval quantity fields have been corrected in the order report for the correct representation of the case when the Buy/sell indicator is 'C' (standing for both buy and sell).
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

3.2 Examples related to continuous contracts

Example 2.14 Order on an exchange traded derivative placed in a regulated market [UPDATED]

First draft	The settlement method in Data field (26) has been corrected to 'C' for 'Cash' instead of 'P' for 'Physical'.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

3.3 Examples related to continuously traded contracts on broker OMPs (including voice-brokered)

Example 3.19 Gas monthly forward, sleeve trade (with order on screen) [UPDATED]

First draft	A correction was carried out in order to align Contract ID reported in Data Field (21) for the buyer order and the sleeve trade.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

3.4 Examples related to bilaterally traded contracts (off-organised market place)

Example 4.07 LNG spot-type contract with defined price and quantity [NEW]

First draft	The first draft of the updated document proposed to include a new example on LNG spot-type contract with defined price and quantity, by proposing to populate the Extra field (available in the REMITTable1 schema) with the relevant delivery terms. It was also proposed to add the 'LNG_' prefix in Data field (31) followed by the UTI as assigned by the counterparties to the contract.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefixes on the Contract ID field, as they add complexity to UTI the algorithm. Instead, they preferred to include this information in Data field (24) Energy commodity adding a new value 'LNG' to the existing ones, NG and EL.
Second draft	Due to the stakeholders' unfavourable opinion on the use of the prefix and the population of the Extra field, the solution proposed in the first draft has been withdrawn. In order to mitigate the stakeholders' concern, the example has been updated in line with the newly introduced energy commodity type ('LG' for liquified natural gas) and Contract type.
Outcome	The proposal of the first draft was accepted.

3.5 Examples on non-standard contracts using Table 2 of the Annex to the REMIT Implementing Regulation

Example 3.01 Power Purchase Agreement (PPA) with lifecycle event [UPDATED]

First draft	Example 3.01 included the following updates proposed by the first draft: Populating of the Extra field (available in the REMITTable2 electronic format) with the source of the generation asset Including the PPA_' prefix in Data Field (11) Contract ID.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefixes on the Contract ID field, as they add complexity to the UTI algorithm. They also opposed the extensive use of the Extra field.
Second draft	The updates proposed under the first round of consultation on using the Extra field to flag the generation asset (see below by Author 1) and adding the prefix to the Contract ID field have been withdrawn. As an alternative solution proposed by the stakeholders, the second draft version of the TRUM proposed to introduce additional accepted values in Data field (13) Contract type for Table 2 being applicable for PPAs, which has been adopted by the second draft version of the updated example 3.01. Field (11) is proposed to be populated with 'PPA_FW'.
Outcome	The proposal of the second draft was accepted.

Example 4.01 Power Purchase Agreement (PPA) - Price Hedging [UPDATED]

Proposal (draft v1)	Example 3.01 included the following updates proposed by the first draft: Populating the Extra field (available in the REMITTable2 electronic format) with the source of the generation asset Including the PPA_' prefix in Data Field (11) Contract ID.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefixed on the Contract ID field, as they add complexity to the UTI algorithm. They also opposed the extensive use of the Extra field.

	The updates proposed under the first round of consultation on using the Extra field to flag the generation asset (see below by Author 1) and adding the prefix to the Contract ID field have been withdrawn. As an alternative solution proposed by stakeholders, the second draft version of the TRUM proposed to introduce additional accepted values in Data field (13) Contract type for Table 2 being applicable for PPAs, which has been adopted by the second draft version of the updated example 3.01. Field (11) is proposed to be populated with 'PPA_FW'.
Outcome	The proposal of the first draft was accepted.

Example 5.01 Power Purchase Agreement (PPA)– Small Scale (<10MW) [UPDATED]

First draft	Example 3.01 included the following updates proposed by the first draft: Populating the Extra field (available in the REMITTable2 electronic format) with the source of the generation asset Including the PPA_' prefix in Data Field (11) Contract ID.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefixes on the Contract ID field, as they add complexity to the UTI algorithm. They also opposed the extensive use of the Extra field.
Second draft	The updates proposed under the first round of consultation on using the Extra field to flag the generation asset (see below by Author 1) and adding the prefix to the Contract ID field have been withdrawn. As an alternative solution proposed by stakeholders, the second draft version of the TRUM proposed to introduce additional accepted values in Data field (13) Contract type for Table 2 being applicable for PPAs, which has been adopted by the second draft version of the updated example 3.01. Field (11) is proposed to be populated with 'PPA_FW'.
Outcome	The proposal of the second draft was accepted.

Example 7.01 Physical Gas Swap Agreement [UPDATED]

First draft	The updated example has been aligned with the REMITTable2 schema: whenever Data Field (23) Volume optionality intervals is populated, Data Field (19) Volume optionality capacity also has to be populated.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

Example 18.01 'ARENH' contracts [UPDATED]

First draft	The updated example has been aligned with the REMITTable2 schema: whenever Data Field (23) Volume optionality intervals is populated, Data Field (19) Volume optionality capacity also has to be populated.

Stakeholder feedback	Stakeholders indicated that for such a contract described in the example, no reliable capacity value can be provided. Reporting parties would be forced to provide data that cannot be based on the contract clauses or estimated. Only when the contract defines capacity values, reliable data can be reported.
Outcome	The stakeholders' consideration was noted, however the introduced update is a consequence of the restrictions of the REMITTable2 schema to provide a value in field (19). Therefore, reporting parties should make their best effort to provide a value that represents the feature of the contract to the best extent possible. The proposal of the first draft was accepted.

Example 23.01 Natural gas delivery at a physical delivery point (REMI) [UPDATED]

First draft	The updated example has been aligned with the REMITTable2 schema: whenever Data Field (23) Volume optionality intervals is populated, Data Field (19) Volume optionality capacity also has to be populated.
Stakeholder feedback	Stakeholders indicated that for such a contract described in the example, no reliable capacity value can be provided. Reporting parties would be forced to provide data that cannot be based on the contract clauses or estimated. Only when the contract defines capacity values, reliable data can be reported.
Outcome	Stakeholders' consideration was noted, however, the introduced update is a consequence of the restrictions of the REMITTable2 schema to provide a value in field (19). Therefore, reporting parties should make their best effort to provide a value which represents the feature of the contract to the best extent possible. The proposal of the first draft was accepted.

Example 29.01 LNG Long term Sales contract with variable dimension and number of cargos [UPDATED]

First draft	Example 29.01 included the following updates proposed by the first draft of the updated Annex: Populating the Extra field (available in the REMITTable2 electronic format) with the relevant delivery terms of the transaction; and Including the LNG_' prefix in Data Field (11) Contract ID.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefixes on the Contract ID field, as they add complexity to the UTI algorithm. Instead, they preferred to include this information in Data field (24) Energy commodity by adding a new value 'LNG' to the existing ones, NG and EL and in Data field (23) Contract type.
Second draft	Due to stakeholders' unfavourable opinion on the use of the prefix and the population of the Extra field, the solution proposed in the first draft has been withdrawn. In order to mitigate the stakeholders' concern, the example has been updated in line with the newly introduced energy commodity type ('LG' for liquified natural gas) and contract type values.
Outcome	The proposal of the second draft was accepted with value 'LG' and contract type 'FW_DES'.

Example 30.01 LNG Long term Sales contract with variable number of cargos and delivery [UPDATED]

First draft	Example 30.01 included the following updates proposed by the first draft of the updated Annex: Populating the Extra field (available in the REMITTable2 electronic format) with the relevant delivery terms of the transaction; and Including the LNG_' prefix in Data Field (11) Contract ID.
Stakeholder feedback	Stakeholders stressed that they generally oppose such prefixes on the Contract ID field, as they add complexity to the UTI algorithm. Instead, they preferred to include this information in Data field (24) Energy commodity by adding a new value 'LNG' to the existing ones, NG and EL and in Data field (23) Contract type.
Second draft	Due to stakeholders' unfavourable opinion on the use of the prefix and the population of the Extra field, the solution proposed in the first draft has been withdrawn. In order to mitigate the stakeholders' concern, the example has been updated in line with the newly introduced energy commodity type ('LG' for liquified natural gas) and contract type values.
Outcome	The proposal of the second draft was accepted with value 'LG' and contract type 'FW_DES'.

Example 31.01 Reliability option contract [NEW]

First draft	The first draft of the updated Annex II included a new example on the reporting of long-term reliability option contracts resulting from the auction run in the framework of a capacity mechanism based on Reliability Options (RO) and concluded by the TSO and the capacity provider.
Stakeholder feedback	Stakeholders provided the following feedback on the proposed example: • ACER should distinguish between Reliability Option contracts (as presented in the consultation) and capacity contracts with a Reliability Option. • Market monitoring data (delivered volumes and price) for such complex contracts can be retrieved in a more reliable way through the reporting of executions than through the reporting of Table 2. • The volume optionality capacity shows numbers in principle – such additions would be better included in the price formula field. • When there is no option strike price that can be indicated as a number, such additions would be better included in the price formula field. • In data field (27) Fixing index sources and in field 37 Option strike index, the capacity auction provider, as the source of the fixing index, should be reported instead of the name of the NRA (as the NRA defines the auction rules only in general). • To correct the values provided for field (16) Estimated notional amount and field (18) Volume optionality capacity.
Outcome	The third draft of the example was considered as final. The final draft included the following amendments in order to accommodate stakeholders' feedback: • Data field (27) Fixing index sources: it was clarified that also the capacity auction provider can be indicated as the source of the fixing index. • Data field (37) Option strike index: it was clarified that the strike price is set by the resolution of the NRA or it may refer to the specific auction run. • The calculated numbers provided for fields (16) and (18) have been corrected. • The potential reporting obligation for capacity contracts with a Reliability Option might be assessed as part of future consultations. • With regards to the proposal to report Executions, stakeholders should refer to the description of the example. • When there is no option strike price that can be indicated as a number, it is proposed to include such additions in the price formula field.

3.6 Examples on gas transportation contracts reportable in Table 4

Example 2.02 Secondary bilateral allocation

First draft	Data Field (13) Capacity category has been corrected to be blank, as this field is mandatory only for primary allocations, while the example refers to secondary allocation.
Stakeholder feedback	No feedback was received.
Outcome	The proposal of the first draft was accepted.

4. LIST OF COMMENTS RECEIVED ON THE UPDATED ANNEX IV

First draft	In the first draft of the updated annex, the reference indicating that for bilateral trades no communication would be expected between the two market participants when generating the UTI has been removed.
Outcome	Based on the feedback received on the updated Annex IV, it was understood that concerns had been raised by stakeholders on the use of the UTI generator tool in relation to the use of prefixes in the UTI/Contract ID fields for the reporting of LNG transactions and PPAs, which had been proposed in the first round of the consultation, but not on the actual amendments carried out in the text of Annex IV. Therefore, no further amendments have been introduced in the document and the first draft version of the updated Annex IV was considered accepted.

5. LIST OF COMMENTS RECEIVED ON THE UPDATED ANNEX VI

First draft	The first draft of the updated annex has been updated by removing references to past exercises related to the accepted delivery points or zones acceptable for reporting in Table 1 and 2, which have already been concluded and thus discontinued.
Stakeholder feedback	Stakeholders pointed out the improper use of terms in the documents and recommended to provide clarifications on the reporting of virtual trading points (VTPs) as delivery points, given the fact that the List of Accepted EICs currently includes some VTPs as accepted delivery point. Stakeholders also raised concerns about the quarterly updates of the List of Accepted EICs, which might not be sufficient.
Outcome	In the second draft version of the updated annex, the terms used in the document were aligned where deemed applicable. The current revision aimed at removing the outdated parts of the document referring to past exercises. Nevertheless, based on the stakeholders' feedback, a more thorough revision may be carried out at future consultations. Considering the VTPs, the issue raised by stakeholders has been noted and may be clarified in the future. Nevertheless, the revision of the EICs that refer to VTPs in the List of Accepted EICs is to be tackled via a different exercise related to a more thorough update of the list. Annex VI may be updated at a later stage as a result of such an exercise. In the meantime, stakeholders are encouraged to use the REMIT Query Form in case of any questions regarding the EICs included/not included in the list. With regard to the frequency of updates of the List of Accepted EIC, reporting parties are expected to notify ACER via the dedicated online form well in advance about the activation of new EICs that could be included in the list (as potentially indicating a delivery point or zone for Table 1 and Table 2). When deemed necessary, the list might be updated on an ad-hoc basis. The second draft version of the updated Annex VI was considered accepted.

6. LIST OF COMMENTS RECEIVED ON THE UPDATED ANNEX VIII

First draft	The first draft of the new Annex VIII on the reporting of LNG supply contracts was largely based on the existing guidance on the reporting of non-standard contracts and transactions specific to LNG provided in the TRUM and FAQ document. The document also adopted the definitions and terminology available in the Guidance on LNG market data reporting (specifying the reporting obligation of LNG market participants under Regulation 2022/2576) considering the type of contracts and the delivery terms typical for LNG transactions. The first draft of the annex (in line with the first draft version of the updated TRUM v6.0 and the first draft version of the 16th edition of the FAQ document) proposed the reporting requirement of the 'LNG_' prefix in the UTI/Contract ID field and indication of the delivery terms in the Extra field of the electronic format.
Stakeholder feedback	Stakeholders provided the following feedback on the first draft version of the new annex – see below. Due to high number of feedback received (given that the document is a new annex to the TRUM), the list of feedback is not exhaustive. Stakeholders proposed to: • further improve the alignment between the REMIT data reporting and the LNG market data reporting in this annex; • include in the annex the scenario where reporting on both sides is not possible, e.g. where there is no contract in place (e.g. where the LNG importer is the owner of the gas production facility abroad) or where the seller is not aware of the EU delivery of the cargo; • specify the timeframes of the reporting in the examples provided in the document; • specify that only when the additional EU Terminal has not been included in the reported Table 2 non-standard contract as a possible delivery point, such a change of the EU terminal should represent a modification (with Action type 'M') (otherwise information on the final delivery point is provided through the Executions); • not to use the term 'Execution agreement' in the document; • align the list of contracts considered outside the scope of reporting as defined by the new annex vs the Guidance on LNG market data reporting. Stakeholders also stressed that a clear statement was missing on the exclusion of FOB cargos that had been concluded on the high seas or simply outside EU waters. In addition, stakeholders requested to withdraw the proposed reporting requirement in relation to the use of the prefix in the UTI/Contract ID field and the population of the Extra field.

Second draft	In the second draft version of the annex, the stakeholders' comments have been addressed as follows: • The alignment between the data collection under REMIT and data collection for the purpose of LNG price assessment and benchmarks has been carried out to the best extent possible given the different purpose, timeline and data collection framework of the two regimes. Further alignment has been carried out in the second draft version of the document. • In exceptional cases, it might be reasonable to accept that only the buy side reports the transaction. • The requested reference to the reporting deadline has been provided throughout the document. • Regarding what is considered as outside the scope of reporting, the document aims to clarify throughout the text that EU delivery is a determining feature of the contract/transaction for whether a transaction is reportable or not. Also, Chapter 5 of the annex aims to provide further clarification on the scope of reporting. It would be misleading to compare the list of contracts/transactions considered outside the scope of the REMIT data collection and those outside the scope of the LNG market data collection, given the different regulatory background, purpose and timeframe of the two data collection regimes. • References to execution agreements have been removed. • The proposal to withdraw the reporting requirement in relation to the proposed use of the prefix in the UTI/Contract ID field and the population of the Extra field has been accepted. The accepted values for the Contract type and Energy commodity fields in Table 1 and 2 have been updated in second draft version of the document in order to flag the transactions and contracts related to LNG.
Stakeholder feedback	Stakeholders indicated that given the newly introduced specification for contract types, it would be beneficial to include in a future release of the document the reference to the contract type to be used and a DES/FOB version for every example. It was also proposed to specify the expected contract type to be reported for transactions related to in-tank transfers, provided that these transactions have no DES/FOB delivery terms.
Outcome	The third draft of the document included the proposed specification on the reporting of the contract type for in tank-transfers. The third draft was considered final.