ACER
European Union Agency for the Cooperation of Energy Regulators

Evaluation report

Public Consultation on assessing the usefulness of ISO 20022 standard for REMIT Exposure data reporting

PC_2026_R_01

9 April 2026

ACER
European Union Agency for the Cooperation of Energy Regulators

Table of contents

1. Introduction

1.1 Objective

The objective of the consultation was to obtain stakeholder feedback on whether aligning with the ISO 20022 standard should form the structural basis of the new exposure reporting format under Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (REMIT). Through this Public Consultation, ACER sought to understand if the use of a common data exchange framework could simplify reporting processes and facilitate data sharing, particularly in the context of cooperation between energy and financial regulators. The feedback collected would allow ACER to determine whether to proceed with implementing ISO-20022 principles in the electronic reporting format.

1.2 Background

In 2024, the revision of REMIT introduced new data reporting requirements, including the obligation to report exposure data, which provides an indication of the market participants exposure to price movements in wholesale energy markets. In August 2025 the European Commission launched a Public Consultation on amending the already existent Implementing Regulation (EU) 1348/2014 on data reporting, which will set out further details on the framework for reporting exposure data to ACER. While this amendment process was not yet finalised, ACER sought to consult at an early stage the high-level design principles of the potential exposure reporting format. In particular, as exposure data is a new and distinct reporting stream under REMIT, ACER will implement a new electronic format ('Exposure XSD') for its reporting. Therefore, ACER launched a public consultation on assessing the usefulness of ISO 20022 standard for REMIT exposure data reporting.

On 9th April 2026, Regulation (EU) No 2026/256 on data reporting implementing Article 7c(2), Article 8(1a), Article 8(2) and Article 8(6) of Regulation (EU) No 1227/2011 and repealing Commission Implementing Regulation (EU) No 1348/2014 ('recast REMIT Implementing Regulation'), was published in the Official Journal of the European Union. According to Article 6 of the recast REMIT Implementing Regulation, positions resulting from trading wholesale energy products shall be reported to ACER by market participants once per quarter (the 'reference period'). The report shall contain the positions of market participants in wholesale energy products with physical delivery or cash settlement within the 18 months following the last day of the reference period, irrespective of where and how such activity is conducted, including intragroup transactions. The information in the report shall be:

a. reported separately for electricity and natural gas, including LNG;
b. reported per delivery point or zone as defined by ACER;
c. reported per product type;
d. differentiated between intragroup and non-intragroup positions; and
e. aggregated by month, for each of the 18 months following the last day of the reference period, as calculated on the last day of the reference period:

Moreover, upon ACER's request, market participants that are subject to the reporting obligation shall provide the following information:

a. forecasted monthly volume of electricity or natural gas production per delivery point or zone and for the reporting period as defined by ACER; and
b. forecasted monthly volume of electricity or natural gas consumption, per delivery point or zone and for the reporting period as defined by ACER, based on the market participant's contracts concluded with its customers.

Transmission System Operators (TSO), Distribution System Operators (DSO), Storage System Operators (SSO), and LNG System Operators (LSO) that purchase natural gas or electricity solely for the technological or operational needs of the system they operate shall report the information set out in Article 6 of the recast REMIT Implementing Regulation only upon request of ACER.

ACER emphasises that, based on the expected reportable details, there is no existing format that can be reused and a new format would need to be implemented. Within this context, ACER explored whether a common framework for exchanging data, i.e. ISO 20022, could be applied to the 'Exposure XSD' reporting format, with the aim of making the reporting process as easy and as interoperable as possible. As a new reporting stream, the Exposure XSD is a suitable candidate that may benefit from the use of an existing standard. Thus, it is the only reporting format covered by this specific consultation, and no changes to existing REMIT reporting formats are being considered. Once the recast REMIT Implementing Regulation enters into force, further targeted consultations will follow on technical specifications and reporting guidance.

1.3 Scope

The scope of the consultation was limited to assessing the appropriateness of applying an ISO-20022-aligned structure to the new REMIT exposure reporting format. It focused on high-level design principles such as the use of standardised data types, message structure, identifiers and naming conventions, and on whether such an approach would improve interoperability and data exchange. The consultation did not address the detailed reporting obligations, individual data fields, validation rules or operational implementation.

ACER analysed stakeholder input to decide whether to adopt ISO-20022 principles as the architectural basis of the exposure reporting format. Following the publication of the REMIT Implementing Regulation, ACER will launch further consultations dedicated to technical specifications and reporting guidance, where the concrete data requirements and reporting procedures will be further defined.

1.3.1 In-scope considerations

The consultation focused on the high-level architectural design of the new exposure reporting stream under REMIT and in particular on whether the electronic format of this new dataset should be aligned with the ISO 20022 principles. Stakeholders were invited to provide feedback on the proposed structure, including the overall message structure, the group header and exposure report sections, the use of ISO-style data field labelling, and the potential merits as well as risks associated with aligning the schema with the standard.

1.3.2 Out-of-scope considerations

The consultation did not address the detailed technical design of the exposure reporting obligations or the specific content that reporting entities may be required to submit. The consultation also did not seek feedback on the reporting guidance for the exposure data. These aspects will be assessed separately during the targeted stakeholder consultation phase.

ACER and the consultation did not consider the ISO application to any existing or other new REMIT reporting electronic formats.

1.4 Approach and methods

ACER welcomes and appreciates receiving different points of view and values all responses provided.

ACER processed the responses received and is committed to delivering high-quality results, hence double counting is avoided. For this reason, if one individual submitted more than one response on behalf of the same organisation, ACER considered only the latest response received.

The Public Consultation questions were formulated as single choice questions with three answers, Agree / Disagree / No opinion, and respondents had the possibility to provide a justification in a free text field applicable to each question. All questions in the public consultation were mandatory.

The summary of responses provided in this document is not exhaustive. Neither does it attempt to catalogue every comment received but provides a general overview of the main messages from the respondents.

2. Process

The Public Consultation started on 12th January 2026 and was closed on 9th February 2026. Overall ACER received 35 responses. The list of respondents to the public consultation that agreed to the publication of the name of their company is available in Annex I. Quantitative information about respondents regarding type of organisation and country is provided in Annex II.

All non-confidential public responses can be consulted on the ACER website.

3. Responses received and ACER's view

3.1 Exposure - Overall Structure

The consultation proposes that the new REMIT exposure reporting stream should follow an ISO-aligned message architecture built around a standardised hierarchical structure. The reporting message, called EnergyMarketExposureReportV01, would be organised into a document wrapper containing a group header and a participant-level exposure report, with the exposure report further broken down into detailed exposure elements by commodity, delivery area and delivery period. The group header would contain message-level metadata such as message identifier, creation timestamp and reporting repository identifier, while the exposure report would identify the market participant using ACER codes or LEI identifiers (choice) and then describe the participant's exposure across commodities. In ACER's view that one code would be sufficient, and in case of the LEI, this would be possible as long as it was provided by market participants in their registration details.

Justification: The rationale behind this structure is rooted in interoperability and data consistency. By following ISO-style message patterns and data types, ACER intends to create a reporting framework that can be machine-readable, scalable and compatible with financial regulatory data models. The hierarchical format also reflects the conceptual nature of exposure data, which is not transactional but aggregated, and therefore needs to represent portfolio-level risk rather than individual trades. The proposal aims to simplify reporting processing and facilitate data exchange between authorities, particularly in light of cooperation between energy and financial regulators.

Respondents' feedback

The majority of respondents (20) agree with the proposed overall schema structure, while a considerable number (13) disagree and only one respondent expresses no opinion.

Among the respondents who agree (20), several explicitly support alignment with financial-style reporting structures, noting that interoperability with financial regulatory data models could be beneficial in the future. Some respondents welcomed the modernisation of the reporting framework and indicated that similarity with financial reporting standards would facilitate harmonisation across regulatory domains.

Among the respondents who disagree (13), multiple concerns were raised regarding readability and usability. A number of respondents (2) stated that removing vowels from field names makes the schema difficult to understand operationally. Others (2) argued that the introduction of another structured reporting format increases complexity and implementation burden. Several respondents (2) recommended using complete words and clearer labels to improve human readability.

Concerns were also raised regarding structural complexity. A respondent warned against unnecessarily deep nesting of elements, arguing that the structure should remain understandable for operational users and not only machine processing. A few respondents (2) expressed broader reservations about introducing a new schema at all, citing potential duplication with existing reporting systems and additional development costs.

Finally, a respondent requested clarification regarding identifiers, specifically the coexistence of ACER identifiers and LEI codes, indicating that ambiguity between identifier systems could complicate implementation.

Overall, the feedback shows that objections primarily relate to usability, clarity and operational complexity rather than to the conceptual hierarchical structure itself.

ACER's view

The feedback indicates broad acceptance of the architectural direction but highlights usability and implementation risks. The proposed structure appears conceptually appropriate for aggregated exposure data and aligned with the intended interoperability objectives, yet improvements are needed to ensure proportionality and practical operability. The main concerns do not challenge the hierarchical ISO-aligned model itself but rather its readability, complexity and identifier clarity. To address this, ACER will consider grouping and nesting elements in the XSD only when this allows for efficiency in reporting and avoidance of repetition in values.

3.2 EnergyMktExpsrRpt - Group Header (GrpHdr)

The consultation proposes that the exposure reporting message should include a standardised group header aligned with ISO-style messaging principles. The Group Header would provide message-level metadata, specifically a unique message identifier, a creation timestamp and the identifier of the reporting repository. This header sits at the top of the message structure and applies to the entire exposure report rather than to individual exposure records.

Justification: By following ISO-aligned header conventions, the design aims to make the reporting dataset compatible with existing supervisory data ingestion processes and facilitate structured data exchange across authorities.

Respondents' feedback

The majority of respondents (20) agree with the ISO-aligned Group Header proposal, a notable group (12) disagree and a small number (2) express no opinion.

Among the respondents agreeing (20), several consider the header logically consistent with standard reporting practices. Some respondents (6) explicitly noted that the Group Header follows common structured-reporting conventions and supports traceability and governance of submissions. Others (5) indicated that placing identification elements at message level is appropriate because they apply to the whole report rather than individual exposures. A further group (4) emphasised that such a header facilitates supervisory data processing and alignment with broader reporting frameworks.

Among the respondents disagreeing (12), concerns focus mainly on implementation clarity and completeness of specification rather than the concept itself. Some respondents (5) argued that without a fully defined schema and examples it is difficult to assess operational impact. Others (4) questioned how the reporting repository identifier should be interpreted and whether its meaning is sufficiently precise for reporting entities. A few respondents (3) warned against unnecessary structural complexity and requested simplification to ensure operational usability.

Additional remarks also focused on practical operational considerations. Certain respondents (2) indicated that clearer documentation of message identifiers and reporting channel interaction is

required, while others (2) suggested alignment with existing reporting infrastructures to avoid unnecessary implementation effort.

Overall, the feedback indicates that objections relate primarily to specification clarity and operational implementation rather than to the existence or purpose of the Group Header itself.

ACER's view

The feedback indicates that the concept of a message-level header is broadly accepted and consistent with reporting governance requirements, but stakeholders require clearer definitions and documentation. The proposed structure appears appropriate for ensuring traceability and interoperability, while ACER will expand on the definitions and documentation via the respective Guidance.

3.3 EnergyMkrtExpsrRpt - Exposure Report (ExpsrRpt)

The consultation proposes that the Exposure Report should constitute the core business section of the message, positioned below the group header and describing the reporting market participant and its exposure. The section would identify the participant primarily through the ACER code or LEI identifiers (choice) and would contain the participant's aggregated exposure information structured by commodity, delivery area and delivery period.

Justification: A participant-centric report supports market surveillance, enables aggregation across datasets and aligns the energy reporting model with financial regulatory approaches that rely on position-based monitoring. The elective use of LEI alongside ACER identifiers is intended to facilitate cross-regulatory cooperation while maintaining the REMIT-specific identification framework.

Respondents' feedback

The majority of respondents (19) agree with the ISO-aligned Exposure Report structure, a significant group (12) disagree and a small number (3) express no opinion.

Among the respondents agreeing (19), several consider the Exposure Report logically structured for portfolio-level reporting. Some respondents (6) stated that organising exposure information at participant level is appropriate because exposure represents aggregated positions rather than individual transactions. Others (5) noted that the structure supports supervisory monitoring and improves consistency with structured reporting practices. A further group (4) emphasised that the format may facilitate interoperability with financial regulatory datasets and improve automated processing capabilities.

Among the respondents disagreeing (12), concerns mainly relate to implementation practicality and clarity rather than to the existence of an exposure report itself. Some respondents (6) warned that the structure could increase implementation complexity and reporting burden. Others (2) raised concerns about identifier handling, particularly how ACER identifiers and LEIs should coexist within the report. A smaller number (1) questioned readability of the representation.

Additional remarks focused on conceptual interpretation. Certain respondents (2) indicated that the definition of exposure should be clarified so that the reported values consistently represent portfolio risk rather than transactional data, while others (1) suggested that aggregation rules should be explicitly documented to avoid divergent interpretations across reporting entities.

Overall, the feedback shows broad acceptance of the participant-centric exposure concept, with most objections related to definition clarity and operational implementation.

ACER's view

The feedback demonstrates that stakeholders largely support the conceptual design of a participant-level exposure report but require clearer guidance to ensure consistent implementation. The core structure aligns with supervisory objectives and interoperability goals, therefore changing the architecture would not be justified. ACER will provide detailed guidance on exposure definitions, aggregation logic and identifier hierarchy.

3.4 ISO 20022 Data Field Labelling

The consultation proposes that the naming convention of the exposure reporting schema should follow ISO 20022-style data element labelling rules. This means that field names would be constructed using abbreviated technical identifiers derived from ISO standards rather than full descriptive words. The objective is to ensure structural alignment with internationally recognised financial messaging standards and allow systematic machine interpretation of fields across datasets.

Justification: ISO-style labels are intended to be stable identifiers that remain unchanged even if business terminology evolves, thereby facilitating automated processing, schema mapping and cross-regulatory data exchange. By adopting the ISO Data Field labelling, ACER aims to enable easier mapping between energy and financial supervisory datasets and reduce the need for translation layers between systems.

Respondents' feedback

The respondents are relatively divided on the adoption of ISO-aligned data field labelling, with a slight majority (17) agreeing with the proposal, a comparable number (15) disagreeing and a small group (2) expressing no opinion.

Among the respondents agreeing (17), several (6) acknowledge that standardised identifiers would improve interoperability with other regulatory datasets and future cross-authority cooperation. Others (5) emphasise that stable technical identifiers support long-term system maintenance and structured processing. A further group (3) considers alignment with financial-style reporting frameworks beneficial for harmonisation purposes.

Among the respondents disagreeing (15), concerns focus primarily on readability and operational usability. A number of respondents (10) object to the abbreviated naming conventions, including the removal of vowels, arguing that the labels become difficult to interpret. Several respondents (7) indicate that reduced human readability complicates implementation and operational support. Others (9) warn that the approach may increase implementation complexity and operational burden.

Additional remarks relate to documentation and interpretability. Certain respondents (8) request the provision of a comprehensive mapping dictionary or human-readable descriptions to accompany technical identifiers, while others (4) suggest using descriptive names alongside technical labels to balance machine readability and operational clarity.

Overall, the feedback shows acceptance of the standardisation objective but significant concern regarding human interpretability and implementation effort.

ACER's view

The feedback indicates that the interoperability objective is broadly accepted but the usability trade-off requires mitigation. In ACER's view, the naming convention itself serves a long-term regulatory and technical purpose and therefore abandoning ISO-style labelling would undermine the objectives set out when consulting ISO-like schemas. A balanced course of action would be to retain ISO-aligned identifiers while introducing a parallel human-readable layer. This would be part of the new Validation Rules document in the Delegated Regulation Guidance (DRG) and shall include descriptive labels, comprehensive data dictionaries and implementation guidance linking technical names to business meaning. Such an approach preserves interoperability benefits while addressing operational usability and implementation efficiency concerns.

3.5 Final Remarks

3.5.1 Views on the merits in harmonising the electronic format of exposure with ISO principles

The consultation asks stakeholders whether aligning the electronic format of REMIT exposure reporting with ISO 20022 principles would be beneficial.

Justification: ACER aims to determine whether a shared structural logic with financial reporting systems could improve data comparability, facilitate cooperation with financial authorities and reduce long-term system fragmentation.

Respondents' feedback

Out of all respondents, 19 consider that there are merits in harmonising the exposure electronic format with ISO principles, while 15 do not see sufficient merit and no respondent explicitly selected a neutral option.

When grouping responses by stakeholder type, a clear divergence of views emerges:

- Among Market Participants (10), 4 of which also act in a different role as per the applied categorisation (e.g. RRMs), a strong majority supports harmonisation. Specifically, 8 Market Participants agree and 2 disagree. Within this group, 5 respondents highlight improved interoperability and cross-authority reporting alignment, while 3 emphasise long-term simplification of reporting obligations.
- Among Registered Reporting Mechanisms – RRMs (9 pure RRM + 6 mixed RRM combinations = 15 RRMs), the views are more divided. 5 RRMs agree and 10 disagree. Within the disagreeing RRMs, 6 warn about implementation burden and system redevelopment costs, while 4 indicate that ISO alignment could complicate existing reporting infrastructures.
- Among Transmission System Operators – TSOs [2 pure TSO (upon request reporting obligation) + 5 mixed combinations = 7 TSOs], the majority express reservations. 2 TSOs agree and 5 disagree. Within this group, 3 respondents question the proportionality of applying financial-style standards to physical energy data and 2 emphasise operational complexity concerns.
- Among Other organisations (8 pure + 2 mixed = 10 organisations), the majority support harmonisation. 8 agree and 2 disagree. Within this group, 4 respondents highlight regulatory cooperation benefits and 3 stress future data analytics and surveillance advantages.

Within this group, several respondents (9) specifically mention improved cross-authority cooperation and data exchange, while others (6) emphasise long-term standardisation benefits and avoidance of fragmented reporting frameworks. A smaller subset (4) note that harmonisation could enhance automated processing and analytics capabilities.

However, a significant number of respondents (10) express reservations. Some respondents (5) argue that benefits are conditional on proportional implementation effort and that complexity must remain manageable. Others (3) warn that the adoption of financial-style standards may not fully reflect the specific nature of physical energy markets. A few respondents (2) question whether harmonisation alone provides sufficient added value compared to improving the existing REMIT framework.

A small group (2) expresses no opinion, typically indicating insufficient detail to assess the impact.

Overall, the feedback shows that support is concentrated among market participants and non-operational organisations, whereas operational reporting intermediaries and infrastructure operators tend to express greater concern about implementation impact.

ACER's view

The feedback indicates that stakeholders support harmonisation in principle while requesting safeguards against disproportionate implementation burden. The objective of interoperability appears validated, but acceptance depends on practical implementation choices.

3.5.2 Views on the risks in harmonising the electronic format of exposure with ISO principles

The consultation asks stakeholders whether aligning the exposure reporting format with ISO 20022 principles could introduce risks. The purpose of this question is to complement the previous assessment of merits by evaluating implementation impact, proportionality and operational feasibility. ACER seeks to understand not only the conceptual benefits of harmonisation but also whether adopting a financial-style data architecture could negatively affect reporting efficiency, cost or clarity.

Justification: The responses will help determine whether mitigation measures or adjustments are needed before finalising the reporting architecture.

Respondents' feedback

Across all respondents, 25 indicate that aligning the exposure reporting format to ISO principles introduces risks, 6 do not identify risks and 3 express no opinion. The numerical balance therefore shows that even among stakeholders that previously recognised merits in harmonisation, many simultaneously perceive implementation risks. The consultation responses thus do not reject the objective but rather warn against the way it may be operationalised.

When grouping responses by stakeholder type:

- Among the 10 Market Participants, 7 identify risks, 1 does not identify risks and 2 express no opinion. The concerns expressed by this group are mainly proportionality-driven rather than technical architecture-driven. Four respondents indicate that adopting a financial messaging structure could impose requirements exceeding the needs of exposure reporting, particularly because exposure represents aggregated operational information rather than transactional

financial contracts. Three respondents warn that complexity may lead to higher compliance costs and internal data reconciliation effort, especially where companies operate multiple reporting streams. The absence of strong opposition suggests that market participants do not contest harmonisation itself but want assurance that reporting remains business-meaningful and operationally manageable.

- Among the 15 RRMs, 9 identify risks, 4 do not identify risks and 1 expresses no opinion. This is the group most focused on technical implementation implications. Six respondents emphasise redevelopment effort, highlighting that reporting systems are already optimised for existing REMIT XML schemas and that adopting ISO structures may require redesign of validation engines, storage models and submission interfaces. Three respondents stress potential compatibility issues during transition, especially if multiple formats coexist temporarily. Unlike market participants, RRMs do not challenge the conceptual logic but emphasise migration risk, operational continuity and backward compatibility. Their feedback reflects concerns about transitional complexity rather than steady-state reporting.
- Among the 7 TSOs, 6 identify risks and 1 expresses no opinion. No TSO explicitly considers the alignment risk-free. Four respondents raise conceptual concerns, noting that ISO financial messaging conventions are designed for contractual or transactional reporting and may not naturally represent physical system exposures or operational forecasts. Two respondents emphasise operational integration risk, particularly regarding integration with operational planning systems rather than trading systems. This group therefore highlights semantic suitability more than implementation cost.
- Among the 10 other organisations, 8 identify risks and 2 do not identify risks. In particular, 5 respondents focus on interpretative clarity, warning that applying financial terminology to energy exposure data may lead to supervisory misunderstandings if definitions are not strictly defined. Three (3) respondents highlight transition and onboarding challenges, especially for smaller actors or new entrants. Compared to RRMs, this group is less concerned about technical migration and more concerned about regulatory interpretation consistency.

The deeper analysis shows a layered risk perception rather than simple opposition. RRMs focus on system migration risk, TSOs on conceptual suitability, Market Participants on proportionality and operational burden, and other organisations on interpretation consistency. The common element across all groups is not rejection of ISO alignment but concern about how closely financial-style modelling should be applied to an energy-specific reporting context.

ACER's view

The feedback indicates that risk perception is widespread and therefore cannot be treated as marginal stakeholder concern. However, most risks relate to implementation approach rather than to the objective of interoperability itself. This suggests that the strategic direction is acceptable but requires safeguards. A summary of the major identified risks along with the potential mitigation measures highlighting their feasibility level and horizon, is presented in Annex III.

4. Conclusion

The introduction of exposure reporting under REMIT represents a new reporting stream which intends to provide a broader view of market participants' exposure across commodities, delivery areas and time horizons.

Given the increasing interaction between energy markets and financial markets, as well as the growing importance of cross-regulatory data analysis, ACER explored the option of aligning the exposure reporting format with the ISO 20022 specifications. This approach reflects ACER's principle of complementing the core existing ACER reporting standard format with interoperable structures where appropriate, in a manner similar to the adoption of established industry standards such as the IEC CIM used for existing REMIT electronic formats. This is directly linked to the objectives set out in Article 10 "Sharing of information between the Agency and other authorities" of REMIT, which requires ACER to establish mechanisms for sharing information with national regulatory authorities, financial authorities, competition authorities and other relevant bodies at Union level. By adopting a reporting format that is structurally compatible with standards used in financial regulation, ACER can further facilitate the exchange of information with financial authorities and supervisory bodies that already operate using ISO-based or similarly structured datasets. At the same time, reporting entities, particularly those operating across both energy and financial markets, may benefit from a more consistent reporting environment. It is highlighted that improving interoperability on existing frameworks would involve significantly higher complexity, while the adoption of harmonised structures can be more readily achieved for newly developed reporting formats. This underlines the need to carefully assess, in each case, the balance between the expected benefits of harmonisation and the associated implementation effort.

4.1 Overall findings of the consultation

ACER appreciates all feedback received during this public consultation, which constitutes an important input for the assessment of the proposed approach. The results indicate that the ISO alignment of the new exposure reporting electronic format is broadly understood and accepted by stakeholders, particularly in view of the expected benefits in terms of harmonisation and interoperability across regulatory datasets. At the same time, stakeholders highlighted operational considerations such as readability of field naming, implementation complexity, cost implications and the absence of formal ISO certification. These aspects do not challenge the conceptual design of the electronic format, nor were alternative standards proposed that could deliver comparable interoperability. ACER has assessed these aspects and identified mitigation measures, including enhanced documentation, early publication of electronic formats, simplified explanatory material, mapping guidance and alignment of reporting objectives. Most measures are considered feasible in the short to medium term.

For analytical purposes, respondents were clustered by stakeholder category, reflecting their role in the REMIT reporting ecosystem. A detailed overview of reporting obligations and stakeholder feedback is provided in Annex IV.

4.2 Final remarks and next steps

Based on the consultation feedback and the internal assessment conducted by ACER, it is concluded that the exposure reporting electronic format should proceed with an ISO-aligned structure. This conclusion is supported by several factors. The consultation results show that 19 out of 35 respondents

recognise merits in applying ISO principles, including all respondents expected to be subject to exposure reporting obligations.

The respondents that expressed negative views are primarily TSOs. It should be noted, however, that these entities are not expected to be subject to systematic exposure reporting obligations. System operators are expected to report exposure data only upon request from ACER. Any such reporting request would define the specific timeline and duration of the reporting obligation and would be tailored to the circumstances under which the request is issued. In this context, due consideration would be given to the technical readiness of system operators and the implementation requirements associated with the reporting framework. Since exposure reporting represents a completely new reporting stream under REMIT, ACER intends to first gain practical experience from the initial implementation phase of the general exposure reporting obligations before assessing whether targeted reporting requests should be addressed to system operators. This assessment will be reflected in the evaluation report foreseen under Article 15 of the recast REMIT Implementing Regulation. ACER does not foresee issuing reporting requests to TSOs, DSOs, SSOs or LSOs in the near term. Further details regarding the potential reporting obligations of system operators are provided in the Open Letter on the implications of the recast REMIT Implementing Regulation published on 9th April 2026.

Furthermore, the majority of risks identified by respondents can be effectively mitigated through feasible implementation measures, and no major internal technical risks or structural roadblocks have been identified. Additionally, ACER will further assess the potential implications of ISO certification and conduct a technical evaluation.

In parallel, and in the context of the revised data reporting, ACER will explore the possibility of providing additional channels (e.g. web form) for exposure reporting (still via RRMs) in order to simplify and reduce implementation barriers.

Finally, ACER emphasises that the application of ISO-aligned principles is strictly limited to the development of the new exposure data stream. While the consultation has shown overall support for the proposed approach, the majority of respondents also highlighted implementation costs and risks, which would be amplified if applied to existing reporting streams. These costs and risks were already identified in the context of the new exposure reporting stream. The introduction of ISO elements in this context reflects the fact that the exposure dataset is being designed from the outset and therefore allows for the integration of interoperability considerations without impacting existing reporting infrastructures. At the same time, ACER remains fully committed to supporting and maintaining the current reporting framework, including established formats and industry standards (such as IEC CIM) where applicable. These frameworks are well embedded in the energy sector and continue to serve operational and regulatory needs effectively. As such, no holistic migration of existing REMIT electronic formats to ISO is envisaged and the use of ISO-aligned principles for the exposure dataset is therefore a targeted and complementary approach.

Annex I: List of respondents

Respondents to the public consultation were asked on their consent regarding publication of responses and publication of the name of their company.

Among responses provided:

i. 20 respondents agreed that 'Yes, ACER may publish the submitted replies and the name of my company'.
ii. 13 respondents agreed that 'Yes, ACER may publish the submitted replies anonymously'.
iii. 2 respondents declared that 'No, ACER may not publish the submitted replies'.

Please find below the list of respondents that agreed to the publication of the name of their company.

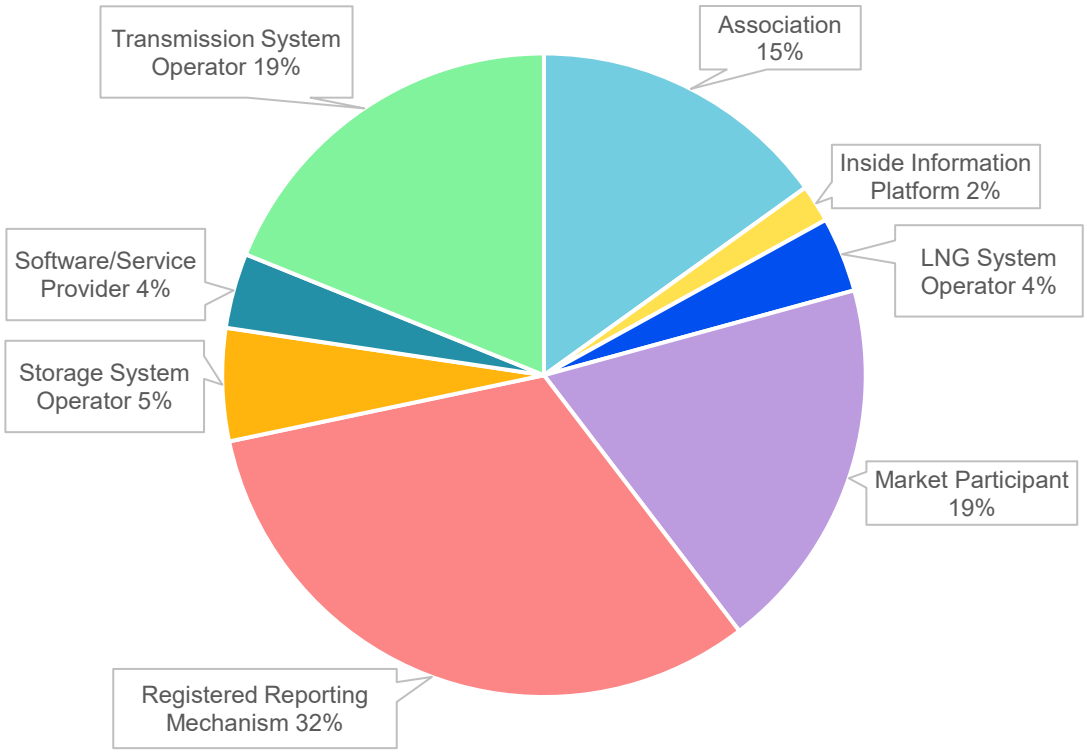
No.	Name	Organisation	Country of origin	Confidential
1.	Vaikoon AG	Registered Reporting Mechanism (RRM)	Switzerland	No
2.	Equias BV	Registered Reporting Mechanism (RRM)	Germany	No
3.	[Respondent X]	Registered Reporting Mechanism (RRM)	[Country X]	No
4.	[Respondent X]	Software/Service Provider	[Country X]	No
5.	[Respondent X]	Market Participant (MP)	[Country X]	No
6.	[Respondent X]	Registered Reporting Mechanism (RRM)	[Country X]	No
7.	Oesterreichs Energie	Association	Austria	No
8.	[Respondent X]	Registered Reporting Mechanism (RRM)	[Country X]	No
9.	[Respondent X]	Registered Reporting Mechanism (RRM); Transmission System Operator (TSO)	[Country X]	No
10.	FGSZ Ltd.	Registered Reporting Mechanism (RRM); Transmission System Operator (TSO)	Hungary	No
11.	Bulgartransgaz	Registered Reporting Mechanism (RRM); Transmission System Operator (TSO)	Bulgaria	No
12.	BDEW	Association	Germany	No

13.	RWE Supply & Trading GmbH	Market Participant (MP)	Germany	No
14.	EDF Group	Market Participant (MP)	France	No
15.	[Respondent X]	Software/Service Provider	[Country X]	No
16.	IOGP Europe	Association	Belgium	No
17.	Eni Spa	Market Participant (MP); Registered Reporting Mechanism (RRM)	Italy	No
18.	AB Amber Grid	Transmission System Operator (TSO)	Lithuania	No
19.	[Respondent X]	Market Participant (MP)	[Country X]	No
20.	EU citizen	Association	Slovenia	No
21.	[Respondent X]	Market Participant (MP); Registered Reporting Mechanism (RRM); Transmission System Operator (TSO)	[Country X]	No
22.	[Respondent X]	Market Participant (MP); Registered Reporting Mechanism (RRM); Transmission System Operator (TSO); Storage System Operator (SSO)	[Country X]	No
23.	[Respondent X]	Registered Reporting Mechanism (RRM)	[Country X]	No
24.	Eurogas	Association	Belgium	No
25.	[Respondent X]	Market Participant (MP); Transmission System Operator (TSO); Storage System Operator (SSO); LNG System Operator (LSO)	[Country X]	No
26.	Europex - Association of European Energy Exchanges	Association	Belgium	No
27.	Energy Traders Europe	Market Participant (MP)	Netherlands	No

28.	SEEBURGER AG	Registered Reporting Mechanism (RRM)	Germany	No
29.	ENTSOG	Registered Reporting Mechanism (RRM); Association; Inside Information Platform (IIP)	Belgium	No
30.	Eurelectric	Market Participant (MP)	Belgium	No
31.	[Respondent X]	Registered Reporting Mechanism (RRM)	[Country X]	No
32.	ENTSO-E	Transmission System Operator (TSO); Association	Belgium	No
33.	Gas Infrastructure Europe - GIE	Registered Reporting Mechanism (RRM); Transmission System Operator (TSO); Storage System Operator (SSO); LNG System Operator (LSO)	Belgium	No

Annex II: Respondents by type of organisation and by country

Representation of respondents by type of organisation



ACER
European Union Agency for the Cooperation of Energy Regulators

Annex III: Identified Risks and Mitigation Measures

No	Flagged Risk	Relevancy	ACER Views / Potential Mitigation Measure by ACER	Mitigation Measure Feasibility Level	Mitigation Measure Horizon
1	Not Human Readable / Higher Complexity	ISO-related	Beyond the XSD file, the Agency can provide a ready-to-be-used holistic XML example where simplified descriptions (human-readable labels) are included for each one of the data fields. Practical reporting templates and sample files for common use cases shall be included in the corresponding Guidance.	Medium	Short
2	Additional effort in the implementation/maintenance of systems (especially for entities not involved in financial markets)	ISO-related & New Schema-related	The implementation effort primarily results from the introduction of a new reporting stream rather than for the adoption of ISO-aligned principles. Any new data stream would require system adaptation for reporting entities, irrespective of the technical standard used. For Market Participants that are not active in financial markets, the adoption of ISO-based structures may initially require additional familiarisation with the technical conventions. The Agency shall provide comprehensive guidance with holistic examples as well as conduct tailored webinars to support the reporting entities.	Low	Long
3	Hybrid standard risk due to lack of ISO certification (interoperability doubts)	ISO-related	The Agency will assess the potential implications of ISO certification and conduct a technical evaluation.	High	Long
4	Insufficient Documentation / Guidance	New Schema-related	The Agency shall provide comprehensive guidance with holistic examples as well as conduct tailored webinars.	Low	Short
5	Short Lead time	New Schema-related	Schemas will be published 12 months before the reporting starts. The Agency shall establish minimum mandatory testing	Medium	Short

			windows and provide clear technical guidance and rapid support during testing phases.		
6	Data quality issues related to the ISO field labelling convention	ISO-related	Annotation in the schema. The Agency shall provide clear data dictionaries and business definitions for all fields (via XML descriptions) as well as practical reporting templates and sample files for common use cases.	Low	Short
7	Advantages will not materialise due to the ad-hoc reporting nature	ISO-related & Legislation-related	In Agency's view, the harmonisation objectives and cross-data interoperability remain achievable even when ad-hoc reporting covers limited or exceptional periods.	Medium	Long
8	Landscape fragmentation risk – Need to establish and maintain a dual-track to operate Exposure XSD alongside existing Table 1/2 processes	ISO-related	The Agency shall provide a data field mapping that identifies common data fields used for Exposure XSD as well as other REMIT Schemas, which can be used by the industry for the backend reporting processes.	Medium	Medium

Annex IV: Feedback summary per respondent category

Respondent category	Subject to Article 6 Exposure Reporting	Feedback Overview

Individual MPs (non-TSOs) + Associations of MPs	YES (Positions quarterly, forecasts on request). 600 GWh/y threshold:
	• Positions resulting from trading WEPs once per quarter
	• Upon request shall provide:
	  ○ forecasted monthly volume of electricity or natural gas production per delivery point or zone and for the reporting period as defined by the Agency
	  ○ forecasted monthly volume of electricity or natural gas consumption, per delivery point or zone and for the reporting period as defined by the Agency, based on the market participant's contracts concluded with its customers.
		• Generally, recognise the strategic value of aligning and support harmonisation.
		• Their feedback consistently indicates acceptance, especially where it could reduce fragmentation between regimes.
		• Their concerns focus on proportionality, increased costs and reconciliation effort.
		• Highlight the importance of clear definitions and guidance.

MPs = TSOs/LSOs/SSOs	Yes, on request: TSOs/DSOs/SSOs/LSOs that purchase natural gas or electricity solely for the technological or operational needs of the system they operate shall report the information set out in this Article only upon request of the Agency. *(No requests towards TSOs, DSOs, SSOs, and LSOs are expected to be issued before ACER has assessed whether the applicable data reporting rules are fit for purpose and issued the report foreseen in Article 15 of the recast REMIT IR)*	• Overall, they are opposed to the application • Express more consistent reservations about conceptual suitability and readability. • Highlight the difference between physical and financial exposure. • Concerns on authorisation / readiness alignment • Prefer direct reporting channel
RRMs	YES, by choice Reporting channel (by choice)	• Generally, accept but stress out potential operational instability. • Highlight migration complexity, system redevelopment and operational continuity risks • Emphasise on coexistence of formats

		• Request clear technical specifications
Others	NO	• Generally, recognise the strategic value of aligning and support harmonisation. • Their feedback consistently indicates acceptance, especially where it could reduce fragmentation between regimes. • Their concerns focus on proportionality, increased costs and reconciliation effort. • Highlight the importance of clear definitions and guidance.