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ACER public consultation: Guideline on REMIT transaction reporting

Fields marked with * are mandatory.

Introduction

Background

Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency ("REMIT") establishes a framework to ensure the integrity and transparency of wholesale energy markets across the Union.

In 2024, REMIT was revised, introducing new and updated data reporting requirements. These changes were further specified in Regulation (EU) No 2026/256 on data reporting (recast REMIT Implementing Regulation), which sets out detailed rules on data reporting obligations, market participant registration, inside information disclosure, and monitoring procedures to ensure consistent enforcement of REMIT across EU wholesale energy markets.

Scope of the Guideline on transaction reporting

The revised REMIT introduced a new possibility for ACER to develop guidelines and recommendations to national regulatory authorities or market participants (Article 16b REMIT).

ACER has developed the Guideline on REMIT Transaction Reporting to facilitate the understanding of the data reporting rules and requirements under REMIT and the REMIT Implementing Regulation. The purpose of the Guideline on REMIT Transaction Reporting is to separate the technical guidance on how to report data to ACER, addressed in ACER's Transaction Reporting User Manual (TRUM), from the more policy-oriented aspects of data reporting, now consolidated into the Guideline on REMIT Transaction Reporting.

You can download the draft Guideline on REMIT transaction reporting here:

DRAFT_Guideline_on_REMIT_Transaction_Reporting.docx

Objective of the consultation

According to the revised REMIT, ACER shall conduct public consultations regarding the guidelines which it issues.

The objective of this consultation is to gather valuable feedback, needs and views from the public to refine the structure and content of the proposed guideline.

The survey is structured in dedicated sections following the chapters of the proposed guideline. Respondents are invited to submit their feedback on each section via the open questions below and/or by uploading documents with revision proposals in the dedicated section at the end of the survey.

Contact and deadline

The contact point for this consultation is: REMIT.Consultations@acer.europa.eu

All respondents are invited to submit their comments by 12 June 2026, 17:00 (CET)

Related documents

- Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency, https://eur-lex.europa.eu/eli/reg/2011/1227/oj
- Regulation (EU) No 2024/1106 of the European Parliament and of the Council of 11 April 2024 amending Regulations (EU) No 1227/2011 and (EU) 2019/942 as regards improving the Union's protection against market manipulation on the wholesale energy market, https://eur-lex.europa.eu/eli/reg/2024/1106/oj
- Commission Implementing Regulation EU 2026/256 of 30 January 2026 on data reporting implementing Article 7c(2), Article 8(1a), Article 8(2) and Article 8(6) of Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency and repealing Commission Implementing Regulation (EU) No 1348/2014 http://data.europa.eu/eli/reg_impl/2026/256/oj
- ACER REMIT Transaction Reporting User Manual (TRUM) Version 7.0 (published: 17 December 2024), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- FAQs on REMIT Transaction Reporting (published: 30 September 2024), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- 6.1 edition of ACER Guidance on the application of REMIT (published: 18 December 2024), https://www.acer.europa.eu/remit-documents/guidance-remit-application
- Questions & Answers on REMIT policy matters (published: 12 March 2025), https://www.acer.europa.eu/remit-documents/guidance-remit-application
- ACER's Manual of Procedures on transaction and fundamental data reporting (published: 17 April 2023), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- ACER's Requirements for Registration of RRMs (published: 15 January 2021), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- FAQs on REMIT Fundamental Data and Inside Information (published: 30 April 2021), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- Open Letters on Data Quality, https://www.acer.europa.eu/remit-documents/remit-reporting-guidance

- Open Letters on REMIT Policy, https://www.acer.europa.eu/remit-documents/guidance-remit-application

Respondent's data

*** Name and surname**

This information will not be published

[redacted]

*** Email address**

This information will not be published

[redacted]

Name of organisation (if applicable)

BULGARTRANSGAZ EAD

Type of organisation (if applicable)

Multiple values are accepted

- [x] Market participant (including association)
- [ ] Organised marketplace (including association)
- [ ] Inside information platform (including association)
- [x] Transmission system operator (including association)
- [ ] National regulatory authority
- [ ] Academia/research institution
- [ ] Other (please specify)

*** Country**

- (•) EU-27
- ( ) Other

Data protection, confidentiality and publication of results

Data protection

ACER will process personal data of the respondents in accordance with Regulation (EU) 2018/1725, taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available in ACER's data protection notice and on ACER's website.

ACER will not publish personal data.

* I have read and understood the Data Protection Notice on External Webinars / Online Events and Data Protection Notice on Interactions with Stakeholders.

I confirm

Confidentiality and publication

Following this consultation, ACER will make public:

- the number of responses received
- company names, unless they should be considered as confidential
- all non-confidential responses
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or group of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate below whether your response contains confidential information.

* Do you consent to the publication of the name of the organisation?

- (•) Yes
- ( ) No

* Do you consent to the publication of the provided answers?

Please, note that your answer, without your name and organization, may be shared with the EU institutions and national authorities.

- (•) Yes
- ( ) No

* Does your submission contain confidential information?

Please note that submissions containing confidential information will not be published.

- ( ) Yes
- (•) No

Section I: Introduction and scope

This section covers the following topics:

- Legal framework
- Scope and purpose of the Guideline on REMIT transaction reporting
- Target audience
- Transaction reporting and market monitoring
- ACER contacts

Do you have any comments on the guidance provided in this chapter?

GENERAL INFORMATION on the structure of our feedback:

• Throughout this consultation response, the symbol '§' denotes a paragraph. References such as '§2' indicate a comment regarding that specific paragraph of the draft Guideline.

• Due to reached character limits in the form, we are providing feedback on some paragraphs of Section II in the field for "Other comments".

• Our feedback on the responsibilities for reporting of transportation transactions and specifically on Section 2.2.4, including view on the responsible market participants for reporting primary transportation transactions and specific comments on paragraph 191, concerning the reporting of secondary transportation transactions are included in the enclosed file, due to the character limit in the survey form.

• In addition, we are enclosing a version of the draft Guideline containing all of our comments integrated directly into the relevant paragraphs.

Section II: Reporting obligations

II.1 What to report?

This section covers the following topics:

- Transactions to be reported on a continuous basis
- Transactions to be reported on a periodic basis
- Transactions to be reported at the request of ACER
- Reporting requirements regarding transactions executed via a trade-matching system
- Definition of standard and non-standard contracts
- Distinction between product, contract and transaction for standard contracts
- Lifecycle events
- Back-loading requirement

Do you have any comments on the guidance provided in this chapter?

Paragraph 36 of the draft Guideline refers to the ACER Guidance on the application of REMIT, Section 2.3.4. However, the references to and wording of Section 2.3.4 of the ACER Guidance are not consistent with Article 3 (b) of the recast REMIT IR, which already refers to entry-exit systems rather than balancing and bidding zones.

In our view, the amended wording of Article 3(b)(i) and (ii) of the recast REMIT Implementing Regulation,

implies that details about transactions related to contracts for transportation of natural gas shall be provided for the following bookable points:
- interconnection points between entry-exit systems in the Union;
- connection points between entry-exit systems in the Union and transmission systems outside of the Union.

II.2 Who shall report?

This section covers the following topics:

- Reporting parties
- Who shall report transactions concluded on an organised marketplace
- Who shall report transactions concluded outside an organised marketplace
- Who shall report transportation transactions
- Who shall report storage transactions
- Who shall report lifecycle events
- Wholesale energy products already reported in accordance with MiFIR or EMIR

Do you have any comments on the guidance provided in this chapter?

§41, 60, 61 regarding the contracts for storage of natural gas:
It would be useful to clarify that the periodicity in reporting is valid also in cases when transactions are concluded on an OMP.

§66: It may be useful to clarify that, when referring to intragroup transactions, this should not be limited to supply transactions, but may also include other types of transactions.

Sections 2.1.6; 2.1.6.1 - 2.1.6.4 reflect supply contract logic. There are aspects not consistent for the transportation or storage products and contracts.

§110: Regarding the sentence "ACER do however accept one single trade report for certain capacity allocations":
It would be useful if ACER could elaborate in more detail on the acceptance of “one-side reporting” for capacity allocations. Following the deletion of Recital (4) of Regulation (EU) No 1348/2014, it is no longer entirely clear who is responsible for reporting primary capacity allocations (transportation and storage), i.e. whether this obligation lies with the infrastructure operator only, the network/storage users only or both as market participants.
The revision of Recital (4) may have been based on the concept and obligations of OMPs. However, it remains unclear:
- on whose behalf such OMPs would report the relevant data (in the case of standard contracts);
- to whom the OMP should make the reported data (report files and return receipts) available under Article 8 (3) of the REMIT IR;
- which market participant - TSOs/SSOs, network/storage users or both - should be responsible for reporting OTC primary capacity allocations;
- who is responsible for reporting the lifecycle events (LCE) of primary allocations.

It would be surprising if the legislator’s intention was to place the reporting obligation for primary capacity

allocations on network/storage users as market participants, particularly in context of the move towards one-side reporting of storage and LNG fundamental data as obligation solely of the SSO/LSO.
It should be considered that the electronic format of Table 4 is designed for one-side reporting of primary capacity transactions. Even if double-side reporting of primary capacity transactions is expected, this will result in a one-to-one duplication of reports sent on behalf of the TSO and Network User.
Another technical consequence of the proposed change, which also appears to reduce efficiency and runs counter to the objective of optimisation, is that if primary capacity allocations are to be reported by the OMP on behalf of network users, then, in order to avoid the disclosure of commercially sensitive information and to comply with Article 8(4) of REMIT IR, RRMs would need to move away from the current approach of structuring Table 4 report files. Instead of including all auction details (bids and allocations) for all network users in a single report file, they would be required to split and distribute information on the behavior of individual network users across separate report files.
This would increase the number of files exchanged between RRMs and ACER->NRAs, as well as between RRMs and OMPs and between OMPs and MPs.
As a further consequence, the volume and structure of LCE reporting may also be affected.

Splitting reports by network users' activity would allow the relevant MPs to access the corresponding data. However, it would also fragment the reporting of a single auction across multiple reports, preventing TSOs and OMPs from maintaining a consolidated view of the reported information.
This would increase the complexity of data quality monitoring and reconciliation activities.

Furthermore, any correction to the general auction data would necessitate the amendment and resubmission of all associated reports, leading to increased processing activities, higher reporting volumes, and additional operational burden.

Although technically feasible, this approach is not optimal and is inconsistent with the simplification and efficiency objectives underpinning the reporting framework.

To avoid these suboptimal outcomes, resulting from the removal of the provision of Recital (4) of Regulation (EU) No 1348/2014, it would be preferable to consider a guidance solution whereby reporting of primary capacity allocations is carried out by, or on behalf of, the infrastructure operator only.
Otherwise, network users may gain access to reported details about primary capacity allocations that is not necessary for their trading and operational purposes. At the same time they will be required to participate in data quality control, LCE reporting and to bear the costs associated with these reporting activities.
This outcome was neither anticipated nor can it be considered an optimization.

Section 2.1.7 needs to specify which entity(s) is responsible for reporting OTC LCEs of primary capacity allocations.

Section III: Start of reporting and reporting frequency

This section covers the following topics:

- Start of reporting
- Frequency of reporting

Do you have any comments on the guidance provided in this chapter?

§208 and 194:
Regarding paragraph 208 and 194 and the clarification for timeline of reporting of LCEs occurring OTC of transactions initially concluded on an OMP, we would like to state that the timeline of D+2 is not feasible.

Paragraph 85 clearly states that “the bilaterally agreed contract entails elements of customisation”, thereby justifying why the requirements for standard contracts cannot be fulfilled.

In our view, the interpretation and the shortened timeline for reporting OTC LCEs of standard contracts is not consistent with the objectives of optimisation and simplification underpinning the REMIT revision.
Irrespective of the applicable requirement and legal interpretation, a D+2 deadline appears highly challenging to meet in practice and may warrant further consideration in light of operational realities.

Other comments and file upload

Are there any other proposals you would like to share with ACER? (e.g. topics that should be covered, amendments etc.)

§65:
It should be clarified that the ad-hoc requests will be proportionate and that market participants should not be required to enter into new contracts with RRMs, to register as RRMs themselves or to undergo authorization procedures for reporting of the relevant format, for the submission of data subject to such ad-hoc requests. Furthermore, such data should not be required to be submitted to ACER in REMIT electronic format where no such format has been generally established or where the market participant has not implemented it.

§130, 3rd bullet point:
We are not certain that the DSOs have fundamental data reporting obligations.

Section 2.2.1.2. OMP concept:
We have major concerns regarding the treatment of the gas infrastructure operators as OMPs.
In our view, such designation should not be automatic, but should instead be based on a thorough assessment of the activities of the relevant infrastructure operator and the manner in which its capacity products are offered.

§178:
The Guideline should specify that the exogenous data should be made available to OMPs within a timeframe that enables them to comply with the reporting timeliness requirements set out in Article 10 of the REMIT IR. In this regard, the wording of §178 ("no later than at the time of reporting as set out in Article 10 ") is not sufficiently clear or explicit and should therefore be improved.

§179:
The reference to “the transfer price or price of the transaction in secondary allocations, if not already known by the OMP” raises confidentiality and data sensitivity concerns, particularly where secondary transactions are concluded bilaterally outside the relevant OMP platform and are only subsequently registered there (implying exogenous data provision for reporting).
This concern remains relevant even where the OMP is an ISO, especially considering that the TSO/SSO is transferor's counterparty in the underlying primary transaction. The MPs may not willing to disclose with the ISO pricing details of the secondary transactions.

§183:
It'd be useful to clarify for each REMIT data type, whether in case of delegated reporting by the counterparty- one or two separate reports are required to be submitted.

§184:
Regarding the clarification box on MP registration and specifically the statement:
“In the registration form, market participants must indicate their chosen RRM that is reporting on their behalf as well as identifying the OMP or another third party that reports records of transactions. If a market participant intends to report its own transaction data relating to OTC transactions (self-reporting), it should indicate this in section 5 of the market participant registration form and be registered as an RRM by ACER.”

we would note the following concerns:

1. The outcome of ACER’s Public consultations for change of CEREMP and Decision #1 of 2012, has not yet been published and, therefore, it remains uncertain whether Section 5 of CEREMP will be retained in its current form.
In this context, the references in the Guideline to Section 5 of CEREMP may become irrelevant should it be decided that this section will be removed from the register.

2. The Guideline appears to suggest that MPs should indicate in CEREMP the relevant OMP reporting data to ACER pursuant to Article 8(1a) of REMIT as a delegated reporting party.

However, this is not aligned with the current instructions set out in ACER’s RRM Registration User Manual, which indicate that where an OMP, TSO, SSO or LSO reports data pursuant to its own regulatory reporting obligations and by this fulfilling the MPs’ reporting obligations,
such reporting entities should not be identified by the MP as delegated reporting parties in CEREMP.

§185:
To be clarified on behalf of whom the OMP will report the primary transportation transactions

§187:
The statement “primary capacity allocations where bids were submitted on both sides of the orderbook” is not sufficiently precise.
In primary capacity allocation processes, the TSO offers capacity (does not submit bid), while network users submit bids.
Accordingly, the expression should be clarified to reflect this structure.

§194:
1) It would be useful to clarify which MP(s) are expected to report OTC LCEs of primary transportation/storage transactions.

2) The clarification for timeline of reporting of LCEs occurring OTC of transactions initially concluded on an OMP, we would like to state that the timeline of D+2 is not feasible.

You can upload your proposals in Word or PDF here.

Please ensure that all your proposed amendments are in one document, clearly identifying each section affected. Track changed versions of the document are also welcome.

Maximum file size is 1 MB. If your file is larger, please use the functional mailbox: REMIT. Consultations@acer.europa.eu

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/BULGARTRANSGAZ_DRAFT_Guideline_on_REMIT_Transaction_Reporting_comments.docx
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Thank you for your contribution.

Contact

Contact Form