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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)

EDF GROUP

Type of organisation (if applicable)

Multiple values are accepted

- [x] Market participant (including association)
- [ ] Organised marketplace (including association)
- [ ] Inside information platform (including association)
- [ ] 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?

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?

As preliminary comments, regarding the structure of Chapter 2, we believe that it would be more instructive to formulate guidelines on “what, who, when and how”, to make a clear distinction between these dimensions. It would also become more operational for market participants, OMPs and other stakeholders who manipulate the objects to be reported. As a summary, such an approach would lead to a synoptic table easily understandable for all stakeholders.

In the “what” category, we would have the list of transactions.
With all these types of objects to be reported, the guideline could include a summary table listing for each object type:
- “Who” is in charge of reporting knowing that all collected data will flow to ACER through RRMs
- “When” those objects need to be reported: starting date, frequency
- “How” to indicate which table(s) should be used to report the data

Such a summary table would be much more useful for MPs than commenting on implementing regulation line by line while referring to different articles.

On the substance, we already had the opportunity to raise the fact that the new definitions of standard contracts (as being traded on OMPs) and non-standard contracts (as being traded outside OMPs) resulting from the Guidance is not in line with the definition provided in the implementing act under which standard contract means a contract concerning a wholesale energy product that is "admitted" to trading at an OMP. However,

such definitions resulting from the Guidance may, at this stage, have limited consequences on the reporting mechanisms to be used, in particular Table 1 should still be used to report non-standard contracts for which the price and volume are defined when the transaction is concluded.

The sub-chapter 2.1.8 on backloading requirement is unclear. Indeed, for the transition period, it would be worth giving several examples with cases in which a transaction (standard and non-standard contracts) is concluded before 29th April 2026 and lifecycle events or executions occur after that date.

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?

Regarding reporting parties and liability issues, we would expect:

- Clarification on point 129 about the respective regulatory obligation of reporting for each reporting party and associated responsibility, which can take the form of the following amendments (deletion and amendment into brackets): “The legal responsibility to report transactions under Article 8 of REMIT [remove: ultimately] resides with the market participants who enter into the transaction [add: and the other reporting parties in accordance with their regulatory obligations]. [remove: However,] All reporting parties are [add: respectively] responsible [add: in accordance with their regulatory obligations] for the completeness, accuracy and timely submission of data to ACER (Article 14 of the REMIT Implementing Regulation).”

- Clarification on point 130, i.e. that the mechanisms and systems put in place by RRMs to ensure completeness and to detect errors or omissions in the transaction reports this process (i) should remain proportionate and should not evolve into supervisory functions exceeding the technical role assigned to RRMs, (ii) should not delay the reporting obligation and (iii) should not modify data submitted by MPs, or refuse reporting where the information complies with ACER technical specifications.

We also consider that it would also be beneficial to all stakeholders to confirm that balancing services transactions will be reported by TSOs.

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?

The beginning of this sequence shows how important it is to have a summary table as suggested in our answer to section 1. Stakeholders willing to implement their obligations in a pragmatic way need to view things from their perspective, not from the articles laid down in the regulations.

It would be worth adding that executions relating to non-standard contracts are also to be reported within 10 working days after the invoice is edited by the seller.

For the transition period, it would be worth giving examples with cases in which a transaction (standard and non-standard contracts) is concluded before 29th April 2026 and lifecycle events or executions occur after that date.

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.)

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

Thank you for your contribution.

Contact

Contact Form