Contribution ID: 02f563d4-eafb-42a4-8f59-942e23d0dacc
Date: 12/06/2026 16:51:32

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)

Eurelectric

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?

We have concerns about disproportionate operational burden with limited supervisory value: it is important that proposals on new data fields, lifecycle treatment, near-real-time reporting do not significantly increase operational and IT complexity without clear added value for market supervision. Major concerns specifically include, e.g.: (i) execution reporting for low-risk bilateral contracts (e.g., large consumer supply); (ii) novations treated as “cancellation plus new trade”, creating high operational risk.
We also recommend removing any legal uncertainty on what must be reported and who is responsible. In this regard, we still find ambiguity on the scope of reportable contracts, including: (i) supply contracts with final consumers above 600 GWh/year; (ii) electricity storage (including batteries, pumped storage and virtual storage); (iii) hybrid and complex products (PPAs, structured products, intra group transactions).

More specifically, on supply transactions (2.1.1.1), we note a potential ambiguity in the wording regarding supply transactions, particularly in relation to contracts with final consumers exceeding 600 GWh/year. As these contracts are subject to periodic rather than continuous reporting, we recommend explicitly clarifying that supply contracts with final customers exceeding 600 GWh/year fall under the periodic reporting regime and are not subject to continuous reporting obligations. Without such clarification, there is a risk of inconsistent interpretation and potential double reporting. Moreover, with regard to paragraph (2.1.1), execution reporting for contracts with final customers exceeding 600 GWh/year should, as a general rule, only be required upon request by ACER. Such an approach would better reflect the lower market manipulation risk associated with these contracts and ensure that the periodic reporting regime achieves its intended simplification objective.

On electricity storage transactions (2.1.1.3), where production and consumption are covered under a single contract and considering that a battery cannot qualify as a final customer, clarification is required as to whether such single contracts covering production and consumption of battery also fall within the limited reporting scope upon reasoned request by ACER if the battery capacity is ≤ 10 MW. Without clarification, different interpretations may emerge, leading to inconsistent reporting outcomes. Additionally, our current understanding is that the injection of power into, or withdrawal of power from, a battery should generally be reportable as a transaction using Table 1 and/or Table 2. However, uncertainty remains in scenarios where a party enters into a long-term tolling agreement with a battery operator (e.g. for several years of operational control over the storage unit). In such cases, it is unclear whether the arrangement itself falls within the scope of transaction reporting obligations. If such agreements are considered reportable, further clarification would be welcome regarding the appropriate reporting methodology, including (i) whether reporting should be performed under Table 1 or Table 2 and (ii) what specific fields, in particular price-related fields, should be completed.

On transactions related to balancing services (2.1.2.3): It should be explicitly specified that contracts related to balancing services, being concluded between a party and a TSO, are reportable by the TSO, or the OMP, where auctions are hosted on external platforms. Such transactions should not be reportable by any other contracting party.

On intragroup transactions (2.1.3.1): We support that all three options are put forward, as intra-group reporting should follow the group operational “reality” and not only the legal structure.

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?

We find it disproportionate to require that Market Participants have the responsibility (and hence carry out controls) on OMP reporting. This ambiguous responsibility is aggravated by the Market Participants’ lack of access to key data, particularly order book data held by OMPs. Therefore, we strongly recommend that Market Participants be relieved from any implicit responsibility - with the only exception of data that is demonstrably not in possession of the OMP - in consideration of the fact REMIT II introduced an explicit "regulatory delegation" to OMPs.

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?

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.)

Eurelectric recognises and appreciates ACER's effort to develop the Guideline on REMIT transaction reporting and other technical guidance in a timely manner to facilitate the understanding of the data reporting rules and requirements under REMIT and the REMIT Implementing Regulation. We also warmly welcome the opportunity to contribute suggestions for improvements via webinars, workshops and this first wave of consultations.
At the same time, we find it important to note that these consultations raise a wide range of legal, operational and industrial issues, the thorough analysis of which is considerably time-consuming for associations and Members thereof, especially for a large and complex AEMP like Eurelectric.
Against this background, we sought to provide comprehensive feedback on the most crucial matters for our sector. This notwithstanding, we would appreciate the possibility to provide feedback on the entire scope of the current public and targeted consultations also during the 2nd wave (as opposed to only allowing feedback on the modifications after the 1st wave). This would grant sufficient time to complete the review and provide additional substantiated recommendations.

As a first important remark, we find it disproportionate to require that Market Participants have the responsibility (and hence carry out controls) on OMP reporting. This ambiguous responsibility is aggravated by the Market Participants' lack of access to key data, particularly order book data held by OMPs. Therefore, we strongly recommend that Market Participants be relieved from any implicit responsibility - with the only exception of data that is demonstrably not in possession of the OMP - in consideration of the fact REMIT II introduced an explicit "regulatory delegation" to OMPs.
We also have concerns about disproportionate operational burden with limited supervisory value: it is important that proposals on new data fields, lifecycle treatment, near-real-time reporting do not significantly increase operational and IT complexity without clear added value for market supervision. Major concerns specifically include, e.g.: (i) execution reporting for low-risk bilateral contracts (e.g., large consumer supply); (ii) novations treated as "cancellation plus new trade", creating high operational risk.
We also recommend removing any legal uncertainty on what must be reported and who is responsible. In this regard, we still find ambiguity on the scope of reportable contracts, including: (i) supply contracts with final consumers above 600 GWh/year; (ii) electricity storage (including batteries, pumped storage and virtual storage); (iii) hybrid and complex products (PPAs, structured products, intra group transactions).
We have provided more detailed recommendations in the dedicated chapters.

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