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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)

Hellenic Association of Independent Power Producers

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?

1. The transactions under continuous reporting are not sufficiently defined (Clauses 28, 32 and 43)
The draft Guideline states that transactions relating to the supply or storage of electricity fall under continuous reporting, while transactions relating to the supply or storage of electricity to a single consumption unit with technical capability to consume 600 GWh/year or more fall under periodic reporting, unless concluded on an OMP. At the same time, contracts for the supply and distribution of electricity to final customers below 600 GWh /year are, in principle, outside the concept of wholesale energy products, thus are considered non-reportable. Taken together, these rules create uncertainty as to which electricity supply transactions remain subject to continuous reporting.
2. The concept of lifecycle event is too broad and risks over-reporting (Clauses 112 to 119)
The draft Guideline defines a lifecycle event very broadly as “any modification, cancellation, correction, early termination or, where applicable, execution of a trade, order or bilateral contract”. While this wording is in line with the REMIT Implementing Regulation, the reporting parties reasonably conclude that almost any post-transaction closing and any operational development could be treated as a lifecycle event.

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?

1. Reporting responsibility should be expressly clarified (Clauses 123-128 and 182-194)
The draft Guideline does not clearly state who bears the reporting responsibility, since there is no clear interpretation of the terms “market participants”, “persons required to report”, and “reporting parties” (are these terms synonymous, overlapping, or distinct?). For example, in cases where an electricity producer is represented in the market by an aggregator, it is uncertain who is bound to report scheduled volumes.

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?

1. It is not clear which transactions become reportable from 29/10/2027 (Clauses 204-205)
The draft Guideline indicates that the application of the reporting framework is implemented in stages, that is, not all reporting obligations start on the same date. However, it is not sufficiently clear which exact obligations apply from 29/10/2027, creating uncertainty for market participants as to what they must report from that date onwards.
2. The scope of exposure reporting remains insufficiently defined (Clause 204)
The draft Guideline indicates that exposure reporting applies from 01/01/2027, without specifying which transactions and data fall under this category.

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.)

1. General Comment
The overall reporting mechanism remains complex and impractical as the reporting architecture under the revised REMIT framework remains difficult to navigate in practice. Market participants are required to understand the interaction between REMIT itself; the REMIT Implementing Regulation; the multiple transparency and reporting platforms; and the reporting chains. This complexity is especially challenging given the progressive application dates and the lack of clarity regarding the issues raised above. For this reason,

market participants may implement different interpretations during the transition period.

2. Specific Proposals

1. We suggest that ACER includes a short classification matrix clarifying the treatment of the following categories (a) electricity supply contracts below 600 GWh/year; (b) electricity supply at or above 600 GWh /year; (c) storage contracts below 600 GWh/year; (d) storage contracts at or above 600 GWh/year; (e) electricity supply contracts such as PPAs.
2. We recommend that ACER narrows the interpretation of the lifecycle concept in the Guideline and provides concrete examples for reportable and non-reportable events (e.g., under-delivery of contracted energy, balancing deviations).
3. We suggest that the final Guideline (i) explains the terms “market participants”, “persons required to report”, and “reporting parties” and (ii) clarifies who bears the responsibility for reporting transactions. Without such clarification, there is a risk of under-reporting, double-reporting or inconsistent reporting between the parties involved (directly or indirectly) in the same transaction.
4. We recommend that ACER includes into the final Guideline a clear schedule (ideally in annex form) connecting each reporting obligation to (i) the relevant legal provision; (ii) the transaction category; and (iii) the start date of the obligation.
5. We recommend that ACER specifies (i) which wholesale energy products and transactions are included in exposure reporting; (ii) how forecast volumes should be reported (asset level / portfolio level / legal-entity level); (iii) if and how exposure reporting applies to aggregation and storage assets.
6. We recommend that ACER mitigates the risk of divergent interpretation and implementation by the market participants by including a consolidated roadmap of obligations and effective dates, examples by activity type and clarifications regarding the default reporting party for each reportable transaction.

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