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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)

Thyssengas GmbH

Type of organisation (if applicable)

Multiple values are accepted

- [ ] 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?

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?

he scope of Section 4.2 of the current valid TRUM concerning transportation contracts is based on specific categories of bookable points within a transmission system, such as interconnection points, production facilities, storage facilities, LNG facilities, physical hubs and customer exit points. By contrast, Article 3(b) of the recast REMIT Implementing Regulation defines reportable natural gas transportation transactions by reference to transportation between transmission systems rather than individual point categories. Specifically, the provision covers transactions relating to the transportation of natural gas:

- between entry-exit systems in the Union; and

- between entry-exit systems in the Union and transmission systems outside the Union.

This system-based approach is further reflected in the definition of an "interconnection point" under Directive (EU) 2024/1788, which is defined as a physical or virtual point connecting adjacent entry-exit systems or connecting an entry-exit system with an interconnector, insofar as the point is subject to booking procedures by network users.

In light of these changes, we consider that the scope of reportable points under Section 4.2 should be aligned with the revised REMIT framework and focus on transportation transactions involving:

- interconnection points connecting adjacent entry-exit systems in the Union; and
- points connecting an EU entry-exit system with a transmission system outside 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?

We note that the definition of the function of “a system or facility” is not fully aligned between REMIT and MiFID II. Under MiFID II, the operator of a multilateral system performs an intermediary function by bringing together third-party buying and selling interests. To ensure clarity and consistency, ENTSOG recommends that the intermediary role be explicitly included among the criteria for OMP designation under REMIT.
In particular, Chapter 2.2.1.2 (“Organised Marketplaces”), especially paragraph (162), should clarify that a TSO which neither conducts auctions or allocation procedures itself nor intermediates transactions between network users cannot be considered an OMP.
Under Article 3(b) of the recast REMIT Implementing Regulation, primary and secondary gas capacity transactions are arranged via dedicated booking platforms such as PRISMA, RBP or GSA, rather than by TSOs. TSOs act within their regulated function of operating and maintaining the network and do not organise or execute transactions comparable to market intermediaries. Capacity allocation is linked to system operation and subject to regulated tariffs approved by NRAs, limiting market-driven price interaction. TSOs therefore do not facilitate the interaction of multiple buying and selling interests as envisaged under the OMP concept. ENTSOG therefore considers that OMP status should be assessed case by case based on the specific activities performed by an entity.
Regarding paragraph (178), we recommend alignment with Article 8(5) of Implementing Regulation (EU) 2026 /256, which states that market participants shall provide OMPs only with information not already available to them.
Paragraphs (185) and (186), as well as section 2.1.6.5 on OTC primary transactions, do not clearly identify the responsible reporting entity for primary OTC transactions and related lifecycle events concluded on or outside an OMP. Clarification is needed to specify which market role is responsible for reporting these transactions and associated lifecycle events to ACER.
Under Regulation (EU) No 1348/2014, TSOs previously had explicit responsibility for reporting primary capacity allocation contracts. Under the recast REMIT framework, however, the allocation of reporting obligations is less clear and may imply obligations for both TSOs and network users, potentially resulting in duplicate reporting, inconsistent submissions, increased operational complexity and unnecessary reconciliation efforts. Such duplication would undermine the objective of efficient and streamlined reporting under Article 8 of Regulation (EU) No 1227/2011. In addition, the current Table 4 reporting scheme was specifically designed for reporting by TSOs and is not suitable for network users.
Furthermore, Article 8(3) of the recast REMIT Implementing Regulation refers to “the market participant”

entitled to receive reported data from the OMP upon request, without explicitly identifying the responsible participant where several entities are involved. Clarification would therefore support consistent implementation and legal certainty.
Finally, regarding paragraph (191), ENTSOG notes that OTC secondary capacity allocations between market participants fall outside the scope of TSOs' activities. TSOs should therefore not be considered the responsible reporting entities for such transactions when acting as RRMs.

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.)

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