ACER
European Union Agency for the Cooperation of Energy Regulators

Evaluation report

Public consultation on details of how to report energy derivative transactions under REMIT

PC_2026_R_09

29 October 2026

1. Introduction

1.1 Background

Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency[1] ('REMIT') was revised in 2024, introducing new and updated data reporting requirements which were further specified in Implementing Regulation (EU) 2026/256 on data reporting[2] ('REMIT Implementing Regulation').

The changes introduced to the legal framework also required ACER to publish updated data reporting guidance. In an effort to help reporting parties meet their reporting obligations, ACER has developed a consolidated guideline on REMIT transaction reporting – bringing together already established guidance from existing ACER guidance documents as well as refining and updating said guidance to fit the new legal framework. This consolidated guideline also encompasses an Annex dedicated to the reporting of energy derivative transactions under REMIT and Regulation (EU) No 648/2012 on OTC derivatives, central counterparties and trade repositories ('EMIR')[3], based on the previous Annex III of ACER's Transaction reporting User Manual (TRUM).

The main document of the guideline was publicly consulted from 16 April to 12 June 2026, whilst the annex underwent a dedicated public consultation from 16 July to 11 September 2026. The public consultation sought stakeholder views to refine the structure and content of the annex.

The guideline and its annex are intended to be published on the basis of Article 16b of REMIT.

2. PROCESS

2.1 Overview of the assessment of the responses

ACER received submissions from 24 respondents to the public consultation which were processed and considered. In addition, 2 of the respondents included attachments to their submissions which were also processed and considered together with the respondents replies in the consultation itself.

This evaluation report aggregates and summarises the respondents' comments, and provides ACER's view on those comments, where relevant.

1 Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency

2 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.

3 Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories.

All questions included in the public consultation were free text questions, asking respondents for their views on the draft text of the different chapters of the annex to the guideline on transaction reporting. Respondents could also submit their feedback by uploading documents with revision proposals. Consequently, the evaluation report has been composed in a way to reflect the described structure of the questionnaire, thus, in this document ACER provides its view for each question included in the public consultation mainly by addressing the feedback which requested additional clarifications to the draft text or that suggested alternative/additional content.

ACER ensures to respect the confidentiality of respondents. Considering the magnitude of the consultation and ensuring efficient evaluation of responses while maintaining the explicit confidentiality required by some stakeholders, an ad-hoc format has been developed to present the feedback in an aggregated and anonymised manner. In some cases, several respondents had submitted the same or similar feedback, which also made an aggregated summary of the feedback suitable.

The unaltered responses of the respondents that have consented to the publication of the name of their organisation and their feedback are available on ACER's website together with this Evaluation Report.

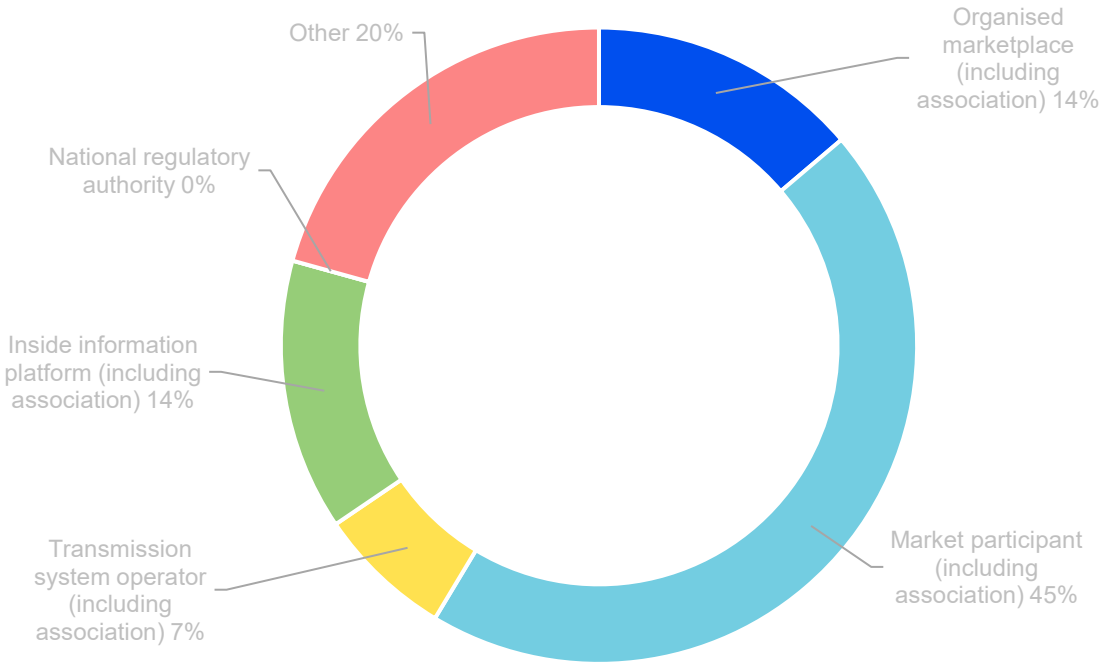
The list of respondents to the public consultation that agreed to disclose the name of their organisation is available in Annex 1 of this Evaluation Report.

In Table 1 "Responses per respondent type" (see below) the number of respondents categorised per type can be found together with a pie chart (Figure 1) detailing the percentages. Please note that since each respondent had the opportunity to select more than one "Respondent Type", the sum of the replies per respondent type (29) is greater than the total number of respondents (24).

Table 1: Responses per respondent type

Respondent type	Number of respondents
Organised marketplace (including association)	4
Market participant (including association)	13
Transmission system operator (including association)	2
Inside information platform (including association)	4
National regulatory authority	0
Other	6
TOTAL	29

Figure 1: Share of respondents by type



3. RESPONSES RECEIVED AND ACER'S VIEW

3.1 Section I – Introduction and scope

This section of the annex covers the following topics:

1.1 Purpose of the annex

1.2 REMIT scope, definitions, terminology

Do you have any comments on the guidance provided in this chapter?
Statistics
15 respondents
Respondents' views
The 15 respondents broadly welcomed the Annex as a focused and practical clarification of the REMIT/EMIR reporting boundary. In particular, respondents supported the objective of avoiding duplicate reporting under the different legislative frameworks. The renewed and more focused purpose of the Annex was also seen as a useful simplification. Several respondents requested further clarification of the geographical and product scope of REMIT. In particular, respondents asked for confirmation that hydrogen derivatives are subject to the same "delivery in the Union" requirement as gas and electricity, and suggested a worked hydrogen example. Further examples in general were requested for electricity, hydrogen and storage derivatives, cross-border products involving EU and non-EU delivery points, and cash-settled derivatives referencing Union price indices. Respondents also sought clarification of the treatment of financially settled energy derivatives, as well as of the distinction between financial and non-financial wholesale energy products, including physically settled commodity derivatives and contracts falling within the MiFID II C6 carve-out. Additional clarification was also requested on the geographical scope of REMIT in relation to SDAC and SIDC, including whether coupled markets must include at least one Member State where potential delivery may occur. Several respondents identified specific conceptual and legal clarifications that would improve the Annex. These included clarifying the use of the term "financial open position", which is not defined under REMIT, and addressing the relationship between REMIT and MiFIR, which is referenced in parts of the Annex despite the stated focus on EMIR. Respondents also asked for clarification of the treatment of non-EU market participants registered under REMIT, particularly those active only in derivative markets. In addition, one respondent suggested explicitly clarifying that a CCP becoming a counterparty to a cleared derivative for EMIR purposes does not, by itself, make the CCP a REMIT market participant or create a separate REMIT reporting obligation in respect of its clearing activity [this suggestion was also made by several other respondents but under section II]. In addition, some respondents highlighted that since the Annex refers to the new Commission Implementing Regulation (EU) 2026/256 with materially renumbered articles compared with Implementing Regulation (EU) No 1348/2014 a short concordance table mapping old to new article numbers would be useful. Finally, several respondents raised clarity issues concerning the scope of inside information and terminology. In particular, respondents suggested refining the example concerning information on physical assets, flows or deliveries outside the Union, to avoid ambiguity regarding the geographical scope of inside information. Some comments also concerned terminology derived from primary legislation, including the use of the term "transaction". Some respondents also requested a short

concordance table mapping the previous and revised article numbers of the REMIT Implementing Regulation, to facilitate updates to internal compliance documentation and RRM specifications.

Overall, the feedback indicates broad support for the Annex's intended simplification, while highlighting a need for additional examples and targeted clarifications to ensure consistent application across different products, market structures and geographical circumstances.

ACER views

ACER takes note of the broad support for the revised purpose and structure of the Annex.

ACER will review the Annex with the aim of further clarifying the terminology used and, where possible, adding additional examples. In particular, ACER will clarify that the scope of REMIT covers both financially and physically settled derivative transactions, as well as how the “delivery in the Union” criterion is assessed for financially settled derivative transactions. ACER confirms that the “delivery in the Union” criterion also applies to hydrogen derivatives relating to supply and will clarify this in the Annex. ACER will further clarify the role of CCPs and clearing houses under REMIT, as well as the concept of a “financial open position”.

ACER will also address the comments concerning geographical scope and market structures. In this context, ACER confirms that the notion of “may be delivered in the EU” in relation to SDAC and SIDC requires the coupled market to include at least one Member State in which potential delivery may occur.

ACER recalls that additional clarifications on aspects of REMIT that apply to all wholesale energy products, and not only to derivatives, are provided in other ACER guidance documents, such as the Guideline on transaction reporting and the Transaction Reporting User Manual. For example, the treatment of non-EU market participants and the scope of inside information are addressed in the existing ACER guidance on REMIT. In addition, ACER’s Q&A on REMIT includes specific questions concerning the disclosure of inside information relating to assets located outside the EU. Where relevant, ACER will include cross-references to these documents in the Annex.

Comments or suggestions that are not consistent with the provisions of REMIT or the REMIT Implementing Regulation have not been incorporated, as ACER cannot amend or introduce requirements beyond those established in the applicable legal framework.

With regard to MiFIR, ACER will retain references to MiFIR where necessary to provide a complete overview and facilitate a clear understanding of the definitions and scope of the relevant financial legislation. However, the scope of the Annex will remain limited to the reporting of energy derivative transactions under REMIT and EMIR. ACER may consider expanding the scope of the Annex in the future to also cover Article 26 of MiFIR.

Finally, ACER takes note of the request for a concordance table mapping the previous article numbers of Implementing Regulation (EU) No 1348/2014 with the new/revised numbers of Implementing Regulation (EU) 2026/256, as an implementation aid. ACER will consider developing such an overview, or a similar tool. However, this would be developed separately from the publication of the Annex, as it would serve as a general implementation aid rather than an aid specifically related to the reporting of energy derivatives.

3.2 Section II – Reporting obligations under REMIT and EMIR

This section of the annex covers the following topics:

- **2.1.** Counterparties vs market participants
  - 2.1.1. CCPs and clearing brokers
  - 2.1.2. DEA providers and their clients

2.1.3. Executing brokers and their clients
2.1.4. Investment firms and their clients
2.2. Energy derivatives reportable under EMIR
2.3. Energy derivatives reportable under EMIR and REMIT
2.4. Energy derivatives reportable only under REMIT

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

Statistics

20 respondents

Respondents' views

Respondents broadly welcomed the aim of clarifying the reporting obligations under REMIT and EMIR, but requested greater legal certainty, clearer terminology and more practical guidance.

Key requests included a glossary at the beginning of the Annex, a comparison table of "market participants" under REMIT and "counterparties" under EMIR, and additional examples or diagrams illustrating different reporting scenarios, particularly for:

- energy derivatives reportable only under EMIR;
- energy derivatives reportable under both EMIR and REMIT; and
- energy derivatives reportable only under REMIT.

There was broad support for the existing mechanism whereby transaction details already reported pursuant to Article 9 EMIR are made available to ACER and deemed to fulfil the corresponding REMIT transaction reporting obligation, thereby avoiding duplicate reporting. However, several respondents noted that double reporting may still occur in practice, particularly for ETDs, due to differences in scope, definitions and reporting requirements. A specific concern was raised regarding the relationship between OMP order-book reporting under REMIT and transaction reporting under EMIR. Respondents stressed that an OMP's obligation to report order-book data is separate from the EMIR reporting obligation of the relevant counterparties and that an OMP cannot determine whether a market participant has fulfilled, or intends to fulfil, its EMIR reporting obligation.

Several respondents requested clearer guidance on when EMIR reporting is deemed to satisfy REMIT reporting, including clarification of:

- delegated and single-sided reporting arrangements;
- lifecycle-event reporting;
- the respective responsibilities of market participants, OMPs, CCPs, brokers and trade repositories; and
- CCP novation, clearing-account transfers and other clearing-related events.

Several respondents also requested explicit clarification that CCPs and clearing brokers do not become REMIT reporting entities as a result of clearing or novation, and that option exercise and other clearing-related events should not create unintended duplicate reporting obligations.

Further practical examples were requested covering bilaterally concluded derivatives, non-EU counterparties and broker-facilitated transactions.

Several respondents also called for clearer and more consistent terminology. In particular, they highlighted the different meanings of "OTC" under EMIR and REMIT and suggested using distinct terminology to avoid confusion between the two regimes. Clarification was also requested of the

term “entity responsible for making the trading decision”. In addition, respondents identified potential misinterpretations or inaccurate references to financial legislation, including the scope of mandatory EMIR delegation under Article 9(1a) and references to MiFID II Annex I Section C7.

Several respondents generally welcomed the inclusion of Direct Electronic Access (DEA), sub-client and pass-through client arrangements in the reporting template. However, they identified a potential inconsistency concerning the treatment of DEA clients as liquidity providers. They requested alignment with the established MiFID concepts distinguishing a direct member/participant from a DEA client, and suggested that this clarification be reflected consistently across relevant ACER documentation.

Finally, one respondent questioned whether the order reporting requirement under REMIT remains necessary where ACER already receives transaction data under EMIR, suggesting a more targeted approach to reduce administrative burden while maintaining effective market monitoring.

ACER views

ACER takes note of the respondents’ broad support for the objective of clarifying the interaction between REMIT and EMIR reporting requirements and welcomes the suggestions aimed at improving the clarity and practical usefulness of the Annex.

ACER will review the Annex with a view to improving the overall clarity and consistency of the terminology and explanations, including the use of terms such as “OTC”. ACER will also correct the factual mistakes in reference to Article 9(1a) of EMIR and MiFID II Annex I Section C7.

Where appropriate and possible, ACER will add further practical examples to illustrate the different reporting scenarios and clarify the respective reporting responsibilities under REMIT and EMIR. ACER will consider including additional examples covering bilaterally concluded derivatives, transactions involving non-EU counterparties and broker-facilitated transactions, where these can usefully clarify the application of the reporting framework. ACER will consider adding a glossary and a high-level comparison of relevant concepts under the two frameworks where this can contribute to greater clarity. ACER stresses that this may also be done in future editions of the Annex, in case not all requested scenarios can be developed for the first publication.

ACER will further review the explanations concerning the interaction between REMIT and EMIR reporting, including lifecycle events and the respective roles of market participants, OMPs, CCPs, brokers and trade repositories. In particular, ACER will clarify that events such as clearing and option exercise are only considered as reportable events under REMIT if the activity results in a new transaction and ACER will also clarify who is expected to report such transactions. The distinction between OMP order-book reporting under REMIT and transaction reporting obligations under EMIR will also be further clarified. In particular, ACER will clarify that as soon as the transaction details have been reported under EMIR, the reporting exemption under REMIT applies, regardless of who reported the transaction. I.e. it is irrelevant if the reporting obligation lay with different entities under EMIR and under REMIT for the exemption to be applicable.

ACER will also review the wording of the paragraphs covering DEA and related client arrangements to ensure consistency with the relevant MiFID concepts. ACER will clarify that the fact that the DEA client can be considered a REMIT market participant does not render it a liquidity provider under REMIT.

Furthermore, the Annex provides guidance on the application of existing legal requirements and cannot modify, extend or otherwise deviate from the applicable primary and secondary legislation. Where the legislation establishes distinct reporting obligations, definitions or responsibilities under REMIT or EMIR, the Annex cannot remove or alter those obligations. Similarly, ACER cannot interpret the legislation in a manner that would be inconsistent with the applicable legal framework. The guidance will therefore seek to explain the interaction between the different regimes as clearly as possible, while respecting their respective legal bases and scope.

3.3 Section III – Reporting derivative transactions under EMIR / REMIT

This section of the annex illustrated ACER's understanding of the EMIR and REMIT reporting obligations in a trading scenario referring to exchange traded derivatives.

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

Statistics

12 respondents

Respondents' views

Respondents broadly welcomed the field-level worked example in this section as a significant improvement in the practical usability of the Annex. They considered that the example helps clarify the allocation of REMIT reporting responsibilities, including that the CCPs involvement in clearing does not change the reporting obligation arising from the original order or trade. However, some respondents requested further clarification of the role of CCPs under REMIT also under this section.

Whilst some respondents welcomed the fact that the Annex refers to the ESMA Q&As, one respondent maintained that one should not need to navigate multiple documents and EMIR reporting scenarios to understand the practical reporting outcome.

Several respondents requested additional worked examples covering a wider range of market arrangements, in particular:

- bilateral OTC derivatives concluded outside an OMP and without clearing;
- DEA chains, including sub-delegated clients;
- exchange-traded derivatives;
- broker-assisted trading;
- give-up/take-up arrangements.

One respondent specifically suggested an additional scenario for a non-financial retailer that makes its own trading decisions and hedges through an executing broker, including the different outcomes depending on whether voluntary EMIR delegation is in place.

Several respondents welcomed the clarification that transaction details already reported under Article 9 EMIR or Article 26 MiFIR fulfil the corresponding REMIT reporting obligation, and requested confirmation that this also applies where reporting is performed on behalf of the relevant person through delegated reporting arrangements. Further clarifications and examples were requested on whether the REMIT reporting exemption covers lifecycle events reported under EMIR, including CCP novation, give-up arrangements and clearing-account transfers.

Some respondents also called for clearer explanation of the division of reporting responsibilities, including explicit confirmation that transaction reports are received through the EMIR reporting framework, order data is reported by the relevant OMP under REMIT, and market participants are not required to submit duplicate reports containing equivalent information. This was considered particularly important for exchange-traded derivatives, where market participants may not have access to the complete order-lifecycle information held by trading venues.

Finally, respondents identified some editorial and presentation issues, including the need to revise the caption of the first reporting example table to accurately reflect that the investment firms role.

ACER views

ACER takes note of the broad support for the field-level worked example and the requests for additional scenarios. ACER agrees that practical examples can help clarify the allocation of reporting responsibilities and will review if additional scenarios can be added.

Taking into account the feedback received, ACER will consider adding further worked examples covering, where relevant, different trading and reporting arrangements, including bilaterally concluded derivatives, DEA arrangements, broker-assisted transactions, centrally cleared OTC transactions, give-up/take-up arrangements and delegated EMIR reporting. ACER will also consider an example illustrating the reporting responsibilities of a non-financial market participant trading through an executing broker. ACER stresses that this may also be done in future editions of the Annex, in case not all requested scenarios can be developed for the first publication. ACER also reminds that additional reporting examples are already available in Annex II of the TRUM.

As indicated also under section II, ACER will further clarify the role of CCPs under REMIT, including that CCP involvement in clearing does not, in itself, change the allocation of the REMIT reporting obligation arising from the underlying order or transaction.

ACER will also review the existing examples to ensure that they accurately reflect the reporting scenario illustrated.

3.4 Additional comments

Respondents were asked if they had any additional proposals (e.g. additional topics that should be covered in the annex, amendments etc.)

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

Statistics

11 respondents

Respondents' views

The comments received under this section were of a general nature and primarily reiterated requests and concerns already raised in response to the other sections of the consultation. Many respondents used this part of the consultation to summarise their overall positions, highlighting once again the need for greater clarity on reporting responsibilities, additional practical guidance and more comprehensive examples. As such, the comments largely reinforced the key themes emerging from the consultation rather than introducing new substantive issues.

However, one respondent asked for a consolidated timeline of reporting obligations by data type and regime, a minimum six-month period between final publication (of the Annex) and applicability, and express confirmation of non-retroactivity, particularly for entities newly captured as market participants. This respondent also asked that the Annex is published together with the general concepts placed in the ACER Guideline on transaction reporting.

Another respondent suggested that as energy derivative trading models continue to evolve, particularly through increased automation, RFQ workflows and cross-border participation, ACER may consider maintaining this Annex as a "living guidance document", complemented by periodically updated practical examples and FAQs. This approach would support consistent

implementation without requiring frequent amendments to the overall ACER Guideline on transaction reporting and the Annex.

Finally, one respondent indicated that, whilst outside the direct scope of the Annex, they would support further consideration by ACER and the European co-legislators to strive to align definitions across energy and financial services legislation whenever suitable for the purposes and implementation of the respective pieces of legislation. For example, a harmonized approach to "beneficial or underlying owner", "end client" or "end position holder" across REMIT, MiFID/R and EMIR would benefit regulatory interpretation, legal certainty and implementation burden.

ACER views

ACER takes note of the general comments received and acknowledges the respondents' requests for greater clarity on reporting responsibilities, additional practical guidance and more comprehensive examples. These points are addressed, where relevant, in the responses to the specific sections of the consultation and have informed the further clarification of the Annex.

ACER is developing a consolidated overview of the applicable reporting obligations by data type under REMIT and the REMIT Implementing Regulation which is intended to be published as a separate Annex to the ACER Guideline on transaction reporting.

ACER considers that establishing a minimum six-month period between final publication of the Annex and its applicability is not possible or necessary, considering the fact that the Annex to a large extent is based on already established guidance (current Annex III of TRUM), refers to legal provisions which are already applicable and in force, and by default is non-binding. The same considerations are valid for the suggestion of non-retroactivity.

ACER reassures that the Annex will be published together with the main document of the ACER Guideline on transaction reporting. ACER will also maintain the Annex as a "living guidance document", with periodical updates. This approach is valid for all ACER guidance documents. ACER recognises the value of keeping practical guidance responsive to developments in market practices and reporting arrangements.

ACER takes note of the suggestion to align definitions across REMIT, MiFID/R and EMIR and agrees that greater consistency of terminology across the relevant legislative frameworks can contribute to legal certainty and reduce implementation costs. However, this suggestion cannot be taken on board as part of this Annex. The Annex must operate within the definitions and scope established by the applicable legal framework and cannot independently harmonise concepts across REMIT, MiFID/R and EMIR. ACER will nevertheless take note of the issue in the context of its broader work and, where appropriate, raise such considerations with the relevant institutions and authorities.

Overall, ACER considers that the feedback received under this section is largely consistent with the clarifications and practical guidance already being developed in response to the more specific consultation comments. ACER will incorporate the suggestions that can improve the clarity and usability of the Annex, while maintaining the scope and structure of the guidance and avoiding changes that would require amendments to the underlying legal framework.

4. COST BENEFIT ANALYSIS

ACER should analyse the related potential costs and benefits of issuing guidelines and recommendations under Article 16b of REMIT. The cost benefit analysis for the guideline on transaction reporting was included in the dedicated evaluation report for that public consultation. The cost benefit analysis for the guideline on transaction reporting indicated that the issuance of the guideline is expected to deliver net positive benefits. The administrative costs associated with developing, maintaining and implementing the guidance are expected to be proportionate and limited when compared with the anticipated improvements in legal certainty, reporting consistency, data quality, regulatory efficiency and market transparency.

The same conclusion can be drawn for the Annex dedicated to the reporting of energy derivative transactions under REMIT and EMIR. The Annex largely builds on and consolidates existing guidance, in particular Annex III to the TRUM, which further limits the incremental costs associated with its development and implementation.

The consultation feedback provides evidence of a clear practical need for the Annex. Respondents broadly welcomed the initiative and requested more detailed guidance, additional reporting examples, expansion of the scope to also cover MiFIR, etc. These requests indicate that the Annex is expected to address existing legal and operational uncertainties and support a more consistent application of the reporting framework.

Overall, the consultation results support the conclusion that the expected benefits of adopting the Annex outweigh the relatively limited incremental costs associated with its development, implementation and maintenance. In particular, the fact that the Annex builds on existing guidance, combined with the strong demand from respondents for greater practical clarity, supports the proportionality of the initiative.

Annex I: List of respondents

The list below outlines the respondents who provided replies to the consultation and who consented to the publication of the name of the organisation and/or company they represent. For those who did not consent to the publication of the name of their organisation, they are marked as “anonymous”.

No.	Organisation	Segment	Country of origin
1.	Anonymous	Other (please specify) - RRM	Other
2.	European Association of CCP Clearing Houses	Market participant (including association); Other (please specify) - CCPs	EU-27
3.	European Energy Exchange AG (EEX)	Organised marketplace (including association); Inside information platform (including association)	EU-27
4.	Energy Traders Europe	Market participant (including association)	EU-27
5.	Europex – Association of European Energy Exchanges	Organised marketplace (including association); Inside information platform (including association)	EU-27
6.	Eurelectric	Market participant (including association)	EU-27
7.	EDF Group	Market participant (including association)	EU-27
8.	Elettricità Futura	Market participant (including association)	EU-27
9.	Verband kommunaler Unternehmen e.V. (VKU)	Other (please specify) - Verband kommunaler Unternehmen e.V. (VKU) is the German Association of Local Public Utilities of municipally determined infrastructure undertakings and economic enterprises. These are companies that provide services of general interest in Germany within the framework of local self-government	EU-27
10.	A2A S.P.A.	Market participant (including association)	EU-27
11.	Webware Internet Solutions GmbH	Inside information platform (including association); Other (please specify) - RRM	EU-27

12.	Proxigas	Market participant (including association)	EU-27
13.	Anonymous	Market participant (including association)	Other
14.	Anonymous	Other (please specify) - RRM	EU-27
15.	Anonymous	Other (please specify) - RRM	EU-27
16.	Anonymous	Organised marketplace (including association)	EU-27
17.	ACENEL — Asociación de Comercializadores de Energía Eléctrica	Market participant (including association)	EU-27
18.	BDEW	Market participant (including association)	EU-27
19.	ENTSO-E	Inside information platform (including association); Transmission system operator (including association)	EU-27
20.	E.ON Energy Markets Gmbh	Market participant (including association)	EU-27
21.	National Grid	Transmission system operator (including association)	Other
22.	Anonymous	Market participant (including association)	EU-27
23.	Anonymous	Market participant (including association)	EU-27
24.	European Venues and Intermediaries Association and London Energy Brokers Association. [“EVIA & LEBA”]	Organised marketplace (including association)	Other