

Summary for the response

The European Network of Transmission System Operators for Gas (ENTSOG), founded in line with the Regulation (EC) 715/2009, has played a key role in facilitating the integration of European gas markets, ensuring technical interoperability, and supporting the security of supply through coordinated infrastructure planning.

ENTSOG acts as a Registered Reporting Mechanism (RRM), reporting fundamental data to ACER on behalf of European gas TSOs. ENTSOG and the gas TSOs support the approach as set out by the European Commission, which ensures that REMIT Implementing Regulation reflects proportionality, technical feasibility, and consistency with existing reporting obligations. ENTSOG welcomes the use of a practical reporting framework that maintains the availability of meaningful market data while avoiding duplication and requirements that could place strain on market participants.

In response to the European Commission's feedback collection on the REMIT Implementing Regulation, ENTSOG and the gas TSOs highlight the following key points:

- **Designation of organised marketplaces (Articles 8(9)–(12)):** Inclusion on the OMP list should be carefully assessed on a case-by-case basis to ensure that only relevant entities are considered. Each case should be evaluated individually, allowing entities to provide justification if they do not meet the definition of an OMP. This ensures reporting obligations are appropriately targeted and avoids unnecessary administrative burdens on entities not active in organised marketplaces.
- Proportionality in reporting primary capacity allocations where no capacity has been allocated (Articles 8 and 12): A distinction between scenarios where bids were submitted but no capacity was allocated, which can offer useful insights for surveillance activities, and scenarios where no bids were placed is needed. For the latter, ENTSOG proposes that reporting should follow an ad-hoc approach as fundamental data, since this scenario has limited value for market monitoring and is already publicly available via Booking Platforms. This approach would reduce unnecessary reporting burdens, also recognising potential incoming additional auctions as proposed by ACER in the ongoing EU CAM NWC revision.



- Scope and exemptions for exposure reporting (Article 6): Exposure reporting should be clear and proportional. Market participants purchasing energy solely for internal or operational use—including TSOs, SSOs, and LSOs—should be exempt from the reporting obligation, since system operators do not engage in speculative, strategic, or hedging activities, and their positions are already captured under other reporting obligations (Article 3).
- **Flexibility of reporting channels (Article 8 (4)):** Lifecycle events outside organised marketplaces should be reportable either directly through RRMs or via third-party mechanisms, including OMPs when acting as intermediaries, giving participants the flexibility needed for timely and accurate reporting while accommodating operational and technical complexities. Reporting of such events should occur no later than ten working days after the event.
- **Avoiding redundant reporting:** Reporting frameworks should be designed to prevent duplication and redundant data submissions, including newly added data elements, under both EU and national frameworks.
- **Sufficient implementation time:** A transitional period is necessary to allow all participants to adapt to the revised reporting obligations, ensuring compliance without compromising the quality of reported data.

By addressing these points, the revised REMIT Implementing Regulation can maintain reporting obligations that are targeted, proportionate, and effective. At the same time, it will reduce unnecessary burdens, avoid duplicate reporting, safeguard the integrity of wholesale energy market monitoring, and support the Commission's objectives of simplifying reporting while ensuring meaningful market oversight.



Proposed amendments to the regulation amending the REMIT Implementing Regulation

Whereas

	Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
	(18)	(18)	Electronic formats shall be based on established industry
	It is important that reporting parties have a	It is important that reporting parties have a clear	standards, as referred to in Article 13(4).
	clear understanding about the details of the	understanding about the details of the information	
	information that they are required to report.	that they are required to report. To this end, the	
-	To this end, the Agency should explain the	Agency should explain the content of the	
	content of the reportable information in a	reportable information in a user manual. The	
	user manual. The Agency should also make	Agency should also make sure that information is	
	sure that information is reported in	reported in electronic formats based on	
	electronic formats, which are easily	established industry standards, which are easily	
	accessible to reporting parties.	accessible to reporting parties.	





Article 5 Transactions to be reported at the request of the Agency

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Proposal for new letter in Paragraph (1):	ENTSOG and the gas TSOs support the Commission's suggestion
The following transactions relating to		that ad hoc reporting should apply to wholesale energy product
wholesale energy products in relation to	(h) details of the procedures for primary gas	transactions "less likely to impact wholesale energy prices or, per
electricity or natural gas shall be reportable	capacity allocations where no capacity has been	se, lead to market abuses in wholesale energy markets."
only upon reasoned request of the Agency,	allocated as a result of the allocation process, more	
and on an ad-hoc basis:	specifically, details of auction with no bids and	It should be emphasised that the data proposed for reporting in
[]	where no capacity was allocated.	Article 8(1) — "primary gas capacity allocations where no capacity
		has been allocated as a result of the allocation process" does not
		influence wholesale energy prices and does not create a risk of
		market abuse. This is particularly relevant for auctions in which no
		bids were submitted, and no capacity was allocated, as such
		events do not contribute to price formation or affect market
		positions.
		TSO tariffs under the CAM NC and TAR NC are regulated,
		determined, and published prior to the start of the gas year,
		before capacity allocation procedures commence. Consequently,
		auctions with no bids or no allocated capacity have no impact on
		wholesale prices and pose no risk of market abuse.
		'
		Accordingly, "primary gas capacity allocations where no capacity
		has been allocated as a result of the allocation process,"
		specifically auctions without bids and without allocated capacity,



should be reported only upon a justified request from ACER, consistent with Recital 10 and Article 5 of the draft revised REMIT IR. This should also be considered with recognition of the number of potential new additional auctions currently proposed by ACER as part of the EU CAM Network Code revision.

Article 6 Exposure reporting

	Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
	Paragraph (2)	Paragraph (2)	From the TSOs' point of view, providing such information will not
	The report referred to in paragraph 1 shall	The report referred to in paragraph 1 shall contain	be meaningful as such events are completely consumer-driven. At
	contain the following information,	the following information, aggregated by month,	the same time, putting such obligations for the TSO would put
	aggregated by month, for each of the 24	for each of the 24 months following the last day of	significant administrative burden with no added value for the
	months following the last day of the	the reference quarter, as calculated on the last day	market.
	reference quarter, as calculated on the last	of the reference quarter:	
	day of the reference quarter:	(a) their positions in wholesale energy products	
	(a) their positions in wholesale energy	with physical delivery or cash settlement within	
	products with physical delivery or cash	the 24 months following the last day of the	
- 2	settlement within the 24 months following	reference quarter, irrespective of where and how	
	the last day of the reference quarter,	such activity is conducted;	
	irrespective of where and how such activity is	(b) the forecasted volume of electricity or natural	
	conducted;	gas production;	
	(b) the forecasted volume of electricity or	(c) the forecasted volume of electricity or natural	
	natural gas production;	gas consumption, based on the market	





(c) the forecasted volume of electricity or
natural gas consumption, based on the
market participant's contracts concluded
with its customers.

The report shall include intra-group transactions.

Paragraph (4)

Market participants with relevant energy volumes below 600 GWh on a yearly basis for all three criteria set out in paragraph 2, assessed separately for electricity and natural gas, shall not be required to submit the report referred to in paragraph 1. Market participants shall assess whether that threshold for energy volumes applies to them on an annual basis at the end of each calendar year.

The threshold of 600 GWh shall be assessed:
(a) as a sum of absolute monthly values resulting from paragraph (2), point (a);
(b) as a sum of absolute monthly values resulting from paragraph (2), point (b);
(c) as a sum of absolute monthly values resulting from paragraph (2), point (c).

participant's contracts concluded with its customers.

The report shall include intra-group transactions.

Paragraph (4)

(i) Market participants with relevant energy volumes below 600 GWh on a yearly basis for all three criteria set out in paragraph 2, assessed separately for electricity and natural gas, shall not be required to submit the report referred to in paragraph 1. Market participants shall assess whether that threshold for energy volumes applies to them on an annual basis at the end of each calendar year.

The threshold of 600 GWh shall be assessed:

- (a) as a sum of absolute monthly values resulting from paragraph (2), point (a);
- (b) as a sum of absolute monthly values resulting from paragraph (2), point (b);
- (c) as a sum of absolute monthly values resulting from paragraph (2), point (c).
- (ii) The obligation to provide the report referred to in paragraph 1 shall not apply to:
- a) Market participants that purchase natural gas or

In light of Article 6 and the reasoning outlined in the Explanatory Memorandum, the objective of exposure reporting is understood to be the facilitation of ACER and NRAs oversight of trading and hedging activities.

The Explanatory Memorandum highlights that trading data alone provides limited additional value for surveillance, as ACER already has access to trading records. "However, what is missing from that 'trading' picture is the underlying physical reality, which allows the Agency to interpret the trading and hedging strategies of market participants and assess potential exposure resulting from those strategies."

Nevertheless, entities that procure electricity or gas solely for internal operational purposes—without engaging in generation, trading, or resale—do not undertake speculative, strategic, or hedging activities. Their consumption is operationally driven and not influenced by market behavior.

Therefore, requiring exposure reporting from such entities would not meaningfully improve the information available to ACER or



electricity exclusively for their own consumption and do not engage in production, supply, or trading activities;

b) TSOs, SSOs and LSOs that purchase or sell natural gas or electricity solely in connection to their own technological or operational needs.

NRAs, given that trading positions in wholesale energy products are already reported. Including these entities in the exposure reporting framework would introduce unnecessary complexity and administrative burden, without contributing significantly to market oversight or transparency.

Example: Exposure reporting for infrastructure operators

Infrastructure operators, including gas TSOs, SSOs, and LSOs, are subject to unbundling requirements that ensure their neutrality and independence from energy production and supply activities. Their procurement of electricity or gas is strictly limited to internal operational needs (e.g., cushion gas, fuel gas), and they do not engage in resale, trading, or hedging activities. As a result, these entities consistently maintain a structurally long position and act solely as end-consumers.

As they are not involved in generation or supply, infrastructure operators cannot provide forecasts of generation or consumption based on contracts with customers. Moreover, their wholesale energy positions are already captured under Article 3 reporting obligations. Introducing exposure reporting requirements under Article 6 for infrastructure operators would neither enhance market transparency nor improve regulatory surveillance.

In light of the abovementioned considerations, and in support of the Commission's simplification objectives to streamline regulatory obligations, market participants that procure natural gas or electricity solely for their own consumption, as well as



TSOs, SSOs, and LSOs acquiring natural gas or electricity
exclusively for technological or operational needs, shall not be
required to provide the information referred to in Article 6,
irrespective of the 600 GWh per year threshold.

Article 7 Details of reportable transactions

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (3)	Paragraph (3)	The legal text should clarify the scope of reporting for hydrogen
The details of the transactions referred to in	The details of the transactions referred to in Article	transportation. It is currently unclear where entry-exit systems
Article 4(8) shall include the following:	4(8) shall include be limited to the following, where	would be applicable for the hydrogen transport. By analogy with
(a) the Agency's registration code of the	applicable:	electricity and natural gas, it is recommended to limit reporting to
market participants entering into the	(a) the Agency's registration code of the market	cross-border/cross-zonal contracts.
transaction,	participants entering into the transaction,	
(b) the timestamp of the transaction,	(b) the timestamp of the transaction,	Furthermore, certain points in the paragraph, such as delivery
(c) information on the delivery profile,	(c) information on the delivery profile,	profile (iii) and type of hydrogen (iv), are not applicable to
(d) the type of hydrogen, such as renewable	(d) the type of hydrogen, such as renewable	transportation contracts. Therefore, "where applicable" should be
hydrogen or low-carbon hydrogen,	hydrogen or low-carbon hydrogen,	applied to the entire paragraph, not only to point (vi), to ensure
(e) price and quantity,	(e) price and quantity,	clarity of reporting obligations. As stated in the Explanatory
(f) the delivery point or zone, where	(f) the delivery point or zone, where applicable,	Memorandum, the details of the transactions referred to in Article
applicable,	(g) information on the traded contract.	4(8) shall be limited to the following listed elements.
(g) information on the traded contract.		





Paragraph (4)

The Agency shall set out the technical details of the reportable information referred to in paragraphs 1, 2 and 3 of this Article and in Articles 4, 5 and 6 in a user manual and, after consulting relevant stakeholders and the Commission, make it available to the public upon entry into force of this Regulation. The Agency shall consult relevant parties and the Commission on material updates of the user manual. Market participants shall submit reportable information to the Agency in accordance with the user manual.

Paragraph (4)

The Agency shall set out the technical details of the reportable information referred to in paragraphs 1, 2 and 3 of this Article and in Articles 4, 5 and 6 in a user manual and, after consulting relevant stakeholders and the Commission, allowing for a minimum period of one month for public consultation, make it available to the public upon entry into force of this Regulation. The Agency shall consult relevant parties and the Commission on material updates of the user manual. Market participants shall submit reportable information to the Agency in accordance with the user manual.

The user manual sets out technical and practical details that directly affect compliance, systems, and costs of stakeholders. A mandatory minimum consultation period of one month would provide stakeholders with sufficient time to identify practical issues, ensure the guidance reflects actual market practices, and promote consistent interpretation.

Article 8 Reporting channels for transactions

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	The term "primary capacity allocations where no capacity
OMPs shall report to the Agency data related	OMPs shall report to the Agency data related to the	has been allocated as a result of the allocation process"
to the orderbooks, including matched and	orderbooks, including matched and unmatched orders and	may refer to two distinct scenarios:
unmatched orders and trades, in relation to	trades, in relation to transactions referred to in Articles 3	- Scenario 1 : Bids were submitted, but no capacity
transactions referred to in Articles 3 and 4.	and 4.	was allocated (e.g. under Article 17(22) of CAM NC).
With reference to Article 3, point (b)(i), the	With reference to Article 3, point (b)(i), the details of	
details of primary capacity allocations where	primary capacity allocations where bids were placed but no	



no capacity has been allocated as a result of the allocation process shall also be reported to the Agency by the respective OMP.

With reference to Article 3, point (b)(ii), OMPs shall report to the Agency transactions registered on their platform as a result of the secondary allocation, irrespective of where the allocation takes place.

OMPs shall report to the Agency the data referred to in this paragraph on behalf of all market participants active on their platform. Market participants shall not report that data to the Agency.

capacity has been allocated as a result of the allocation process shall also be reported to the Agency by the respective OMP.

With reference to Article 3, point (b)(ii), OMPs shall report to the Agency transactions registered on their platform as a result of the secondary allocation, irrespective of where the allocation takes place.

OMPs shall report to the Agency the data referred to in this paragraph on behalf of all market participants active on their platform. Market participants shall not report that data to the Agency. Scenario 2: No bids were submitted during the allocation window, and the procedure closed without any allocation.

ENTSOG and the gas TSOs support reporting procedures under **Scenario 1**, as they may offer analytical value for market surveillance.

However, we oppose the continuous reporting of transactions under **Scenario 2**, due to the following concerns:

- These procedures are unrelated to price formation or market abuse risk.
- Their volume is already extremely high and is expected to increase further with the large number of new auctions to be conducted under the latest CAM revision proposals, exceeding the levels relevant for monitoring by over 10,000%, and providing minimal surveillance value.
- Reporting them would introduce excessive noise, complicating the analysis of meaningful transaction data.
- Relevant information is already publicly available via Booking Platform portals per auction.
 Additionally, the Booking Platform publishes monthly reports with details about all performed auctions and this information is reported monthly to ACER's Gas, Hydrogen and Retail Department.



Paragraph (4)

Market participants shall provide the following information to the OMP where the trading occurs:

- (a) information regarding the identity of the intermediate or final beneficiaries of the transaction, if different from the market participant trading on the OMP;
- (b) any information relating to lifecycle events of a transaction that was concluded on the OMP but where the lifecycle event occurred outside the OMP.

The information referred to in this paragraph shall be made available to the OMP no later than at the time of reporting as set out in Article 10 and shall be reported to the Agency by the OMP, as part of the OMP's reporting obligation set out in paragraph 1 of this Article.

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- (a) information regarding the identity of the intermediate or final beneficiaries of the transaction, if different from the market participant trading on the OMP;
- (b) any information relating to lifecycle events of a transaction that was concluded on the OMP but where the lifecycle event occurred outside the OMP.

The information referred to in this paragraph shall be made available to the OMP no later than at the time of reporting as set out in Article 10 and shall be reported to the Agency by the OMP, as part of the OMP's reporting obligation set out in paragraph 1 of this Article.

Recommendation:

- Include **Scenario 1** procedures in continuous transaction reporting.
- Treat Scenario 2 procedures as part of ad-hoc reporting of fundamental data, reflecting their limited relevance to surveillance and avoiding unnecessary reporting burdens.

ENTSOG and the gas TSOs note the current text regarding primary contracts for the transportation of natural gas concluded on organised marketplaces may create uncertainty regarding the reporting of subsequent modifications to these contracts. These lifecycle events are not recorded on OMPs, and involving the platforms in reporting would require processes and arrangements outside their regular activities, which are unrelated to their core responsibilities and could risk data integrity, delays, or disputes over accountability.

ENTSOG and the gas TSOs recommend that market participants retain the flexibility to select the reporting channel for lifecycle events occurring outside of OMPs, either:

- directly via registered reporting mechanisms (RRMs), or
- via a third-party RRM, including, the booking platform (i.e. the OMP).



Paragraph (8)

The Agency may request additional information and clarifications from market participants, including LNG market participants, and reporting parties in relation to the data that are to be reported pursuant to this Regulation. Such requests may also include access to the original bilateral contract concluded by the market participants.

Paragraph (8)

The Agency may request additional information and clarifications from market participants, including LNG market participants, and reporting parties in relation to the data that are to be reported pursuant to this Regulation. Such requests may also include access to the original bilateral contract concluded by the market participants. Such requests should be justified and exercised in accordance with the principle of proportionality, with the Agency ensuring the confidentiality, integrity, and protection of the information provided. For instance, the Agency could request access to the original bilateral contract in case of reasonable suspicions that certain conduct could amount to a breach of Regulation (EU) No 1227/2011.

Additionally, in the proposed text of the REMIT Implementing Regulation, the deletion of Recital (4) and the reference in Article 8(3), introduce uncertainty regarding which market participant—TSO or network user—should provide the data on contract modifications to the OMP. Clarification is necessary to ensure that reporting obligations are clear, proportional, technically feasible, and that the data reported is accurate, complete, and timely.

ENTSOG and the gas TSOs suggest that ACER's proposed access to the systems of market participants and RRMs should be carefully targeted. Such requests for additional information, clarification, or system access could be aligned with the approach applied to organised marketplaces under Article 8(1a)(b) of Regulation (EU) No 1227/2011.



Paragraph (11)

If an OMP has failed to notify the Agency pursuant to paragraph 10, the Agency may request the necessary information from that OMP and shall include the OMP in the list.

Paragraph (11)

If an entity potentially falling within the definition of an OMP has failed to does not notify the Agency pursuant to paragraph 10, the Agency may request the necessary information from that OMP entity shall include the OMP in the list to assess on a case-by-case basis whether it should be included in the list or determine the reasons why the it shall not be considered as OMP.

The proceeding before the Agency shall be concluded with the decision as understood under Article 2(d) of the Regulation (EU) No 2019/942. Article 28 and 29 of the Regulation (EU) No 2019/942 shall be applicable accordingly, but the application of the contested decision shall be suspended until the final Board of Appeal Decision.

ENTSOG and the gas TSOs recommend revising Article 8(11) to ensure that the designation of an OMP role is based on a careful, case-by-case assessment of each entity's actual market functions. This assessment should include clear procedural safeguards and allow entities to present their position.

Designation as an OMP entails significant obligations, including transaction reporting, PPAT responsibilities, market surveillance duties, and internal governance requirements, which are appropriate only for entities that actively facilitate transactions. Assigning infrastructure operators to this role would create a direct conflict of interest, as they participate in the very transactions they would be required to monitor, thereby compromising the neutrality essential for effective market oversight.

Furthermore, assigning OMP status to infrastructure operators could lead to regulatory misalignment. These entities are not structured to operate as marketplaces and are already subject to sector-specific regulations tailored to their technical and operational roles. Imposing OMP-related compliance obligations would place a disproportional administrative burden on them, divert resources from their core responsibilities, and risk affecting the efficiency and reliability of critical infrastructure operations.



In view of these concerns, ENTSOG and the gas TSOs stress the need for a well-defined and proportionate approach to OMP designation. emphasize that Article 8(11) must ensure OMP designation is founded on thorough assessments and procedural safeguards reflecting each entity's actual role in the market.

Article 10 Timing for reporting of transactions

	Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
	Paragraph (1)	Paragraph (1)	Lifecycle events, such as modification or cancellation, can be
	Details of transactions referred to in Article	Details of transactions referred to in Article 3,	disputed. Their admissibility must be confirmed before reporting
	3, point (a), relating to standard contracts	point (a) concluded on OMPs relating to standard	to ensure accuracy and compliance.
	shall be reported as soon as possible but no	contracts shall be reported as soon as possible but	
	later than two working days following the	no later than two working days following the	
	conclusion of the trade or the placement of	conclusion of the trade or the placement of the	
A	the order.	order.	
		Details of transactions referred to in Article 3,	
		point (a), concluded outside an OMPs, relating to	
		standard contracts shall be reported as soon as	
		possible but no later than ten days following the	
		conclusion of the trade or the placement of the	
		order.	





All lifecycle events related to transactions referred to in Article 3, point (a) shall be reported no later than ten working days following their acceptance. Paragraph (4) Details of transactions referred to in Article 3, point (b), relating to standard contracts shall be reported as soon as possible but no later than two working days after the allocation results have become available. Details of transactions referred to in Article 3, point (b) concluded on OMPs, relating to standard contracts shall be reported as soon as possible but no later than two working days after the allocation results have become available. Details of transactions referred to in Article 3, point (b), concluded outside an OMPs, relating to standard contracts shall be reported as soon as possible but no later than two working days after the allocation results have become available. Details of transactions referred to in Article 3, point (b), concluded outside an OMPs, relating to standard contracts shall be reported as soon as possible but no later than two working days after the allocation results have become available. Details of transactions referred to in Article 3, point (b), concluded outside an OMPs, relating to standard contracts shall be reported as soon as a possible but no later than two working days after the allocation results have become available. Details of transactions referred to in Article 3, point (b), concluded outside an OMPs, relating to standard contracts shall be reported as soon as possible but no later than two working days after the allocation results have become available. We recommend that reporting deadlines be determined by the execution venue (OMP or OTC), rather than by contract type. The Commission's rationale, outlined in the Explanatory Memorandum to Article 10, underscores the significance of the place of execution in determining reporting timeframes.
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All lifecycle events related to transactions referred timeline should apply only to transactions occurring on organised
to in Article 3, point (b) shall be reported no later marketplaces (OMPs).
than ten working days following their acceptance. Applying a uniform ten-working-day reporting deadline for all
lifecycle events would ensure clarity and consistent
implementation, while accommodating the practical challenges of
collecting, preparing, and transferring lifecycle event data across
multiple systems and platforms.
Article 10(5) of the proposed text does not address the conclusion
of contracts under Article 3(b) outside an OMP. Accordingly, the





		reporting timeline for such contracts and their associated lifecycle events is not defined.
Paragraph (5)	Paragraph (5)	Lifecycle events, such as modification or cancellation, can be
Details of transactions referred to in Article	Details of transactions referred to in Article 3,	disputed. Their admissibility must be confirmed before reporting
3, point (b), relating to non-standard	point (b), relating to non-standard contracts shall	to ensure accuracy and compliance.
contracts shall be reported as soon as	be reported as soon as possible but no later than	
possible but no later than ten working days	ten working days following the conclusion of the	
following the conclusion of the trade, or the	trade, or the occurrence acceptance of the lifecycle	
occurrence of the lifecycle event.	event.	

Article 12 Rules for the reporting of fundamental data on natural gas

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (2)	Paragraph (2)	Fundamental data is intended to complement the reporting and
Gas Transmission System Operators shall	Gas Transmission System Operators shall report to	analysis of information related to transportation contracts. To
report to the Agency and, at their request, to	the Agency and, at their request, to national	ensure consistent alignment between the scope of reportable
national regulatory authorities in accordance	regulatory authorities in accordance with Article	transactional data under Article 3(b)(i) and the scope of
with Article 8(5) of Regulation (EU) No	8(5) of Regulation (EU) No 1227/2011 day-ahead	fundamental data, ENTSOG and the gas TSOs recommend that exit
1227/2011 day-ahead nominations and final	nominations and final re-nominations of booked	points connected to a single customer be excluded from the scope
re-nominations of booked capacities	capacities specifying the identity of the market	of Article 12(2).
specifying the identity of the market	participants involved and the allocated quantities.	
participants involved and the allocated	The information shall be made available no later	
quantities. The information shall be made	than the two following working days.	



available no later than the two following working days.

That information shall be provided for the following points of the transmission system:

- (a) all interconnection points;
- (b) entry points of production facilities including of upstream pipelines;
- (c) for exit points connected to a single customer;
- (d) entry and exit points to and from storage;
- (e) for LNG facilities;
- (f) for physical and virtual hubs.

That information shall be provided for the following points of the transmission system:

- (a) all interconnection points;
- (b) entry points of production facilities including of upstream pipelines;
- (c) for exit points connected to a single customer;
- (d) entry and exit points to and from storage;
- (e) for LNG facilities;
- (f) for physical and virtual hubs.

Paragraph (10)

The Agency may request additional information and clarifications from Transmission System Operators, LNG System Operators, Storage System Operators, Distribution System Operators or from RRMs reporting on their behalf in relation to the data that are to be reported pursuant to this Regulation.

Paragraph (10)

The Agency may request additional information and clarifications from Transmission System Operators, LNG System Operators, Storage System Operators, Distribution System Operators or from RRMs reporting on their behalf in relation to the data that are to be reported pursuant to this Regulation.

The scope of reportable data is defined by the REMIT Regulation and the REMIT Implementing Regulation. Any requests for additional information should remain limited to clarifications within the defined scope and should not lead to newly imposed reporting obligations not prescribed by the legislation.





Article 17 Entry into force and application

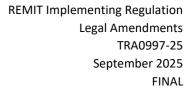
Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (6)	Paragraph (6)	The period of six months is not sufficient for implementation of
Article 6 shall apply from [OP: please insert	Article 6 shall apply from [OP: please insert the	the exposure reporting, as the reporting schema needs to be
the date = 6 months from the date of entry	date = 6 months 12 months from the date of entry	consulted, implemented, and tested. A period of 12 months
into force of this Regulation].	into force of this Regulation].	should ensure accurate, complete, and reliable reporting by
		market participants.
Article 7(2) and Article 10(6) shall apply from	Article 3, and Article 4(2), Article 12(5), Article	
[OP: please insert the date = 12 months from	12(9) and Article 8(4) shall apply from [OP: please	Paragraph 4 of Article 7 of the proposed REMIT IR states that the
the date of entry into force of this	insert the date = 12 18 months from the date of	Agency will define the technical details of reportable information
Regulation].	entry into force of this Regulation].	—including exposure reporting under Article 6 —through a user
		manual, following consultation with stakeholders and the
Article 3 and Article 4(2) shall apply from	Article 8(1) second sentence shall apply from [OP:	Commission.
[OP: please insert the date = 12 months from	please insert the date = 18 months from the date	
the date of entry into force of this	of entry into force of this Regulation].	To support effective implementation, we suggest a more practical
Regulation].		timeline for the application of Article 6. This timeline should
		reflect:
Article 4(1), 4(3), 4(4), 4(5), 4(6) and 4(7),		- The time required to develop and publish the ACER user
Article 9, and Article 11(4) shall apply from		manual;
[OP: please insert the date = 18 months from		- A through and inclusive stakeholder consultation process;
the date of entry into force of this		- Sufficient time for market participants and RRMs to
Regulation].		implement the necessary technical and organisational
		solutions.
Article 4(8) shall apply from 1 July 2028.		



ENTSOG and the gas TSOs therefore recommend that the application of Article 6 to begin no earlier than 12 months after the Regulation enters into force.

As per Article 7(4) and 13(4), the Agency is tasked to develop the technical guidance and reporting schemas for the purpose of implementation of the provisions under this Regulation. To allow sufficient time for the Agency to fulfil the tasks, including conducting consultations with the relevant stakeholder, and the entities (i.e., MP, OMPs) to implement the following changes for the purpose of reporting, ENTSOG and the gas TSOs recommend that that the application of Article 3, Article 4(2), Article 12(5), Article 12(9), and Article 8(4) no earlier than 18 months after the Regulation enters into force.

If the European Commission does not consider our proposals for amendment of Article 5(1) and Article 8(1) to proceed as ad-hoc reporting of the details of primary capacity allocations where no capacity has been allocated, ENSTOG and the gas TSOs recommend that that the application of Article 8(1) second sentence no earlier than 18 months after the Regulation enters into force.





ANNEX

Table 4 - Reportable details of wholesale energy products in relation to the transportation of natural gas

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Data Field 9 – Product type	Data Field 9 – Product type	The product type, defined by its duration, can already be
		identified from the existing data fields in Table 4, making the
Description:	Description:	addition of a separate dedicated field unnecessary.
The field indicates the type of the product	The field indicates the type of the product such as	
such as daily, weekly, or other.	daily, weekly, or other.	Specifically, product duration can be derived from the following
		elements:
		- Data Fields 13 and 14 (revised Table 4 of the REMIT IR):
		Start and End Date of the Transportation Transaction
		Runtime,
		- Data Field 7 : Auction Open Date and Time,
		- Validity Period: an additional element included in the
		electronic reporting format for Table 4 as defined by
		ACER.
		Under the CAM NC framework, gas transportation capacity is
		allocated exclusively through standardized products (yearly,
		quarterly, monthly, daily, within-day), following the ENTSOG
		auction calendar. This structure allows the product type to be
		determined by cross-referencing the start and end dates of the
		transportation period with the relevant auction schedule.



Data Field 12 – Offer of additional capacity	Data Field 12 – Offer of additional capacity	ENTSOG and the gas TSOs propose not introducing a separate new
		data element for incremental capacity procedures (Offer of
Description:	Description:	additional capacity), but rather integrating suitable values for
The field indicates open season, incremental	The field indicates open season, incremental	identifying such transactions within Data Fields 10 and 11 .
auctions or other processes to determine the	auctions or other processes to determine the	
demand for an increase in capacity	demand for an increase in capacity availability.	If the "offer of additional capacity" is treated as a general
availability.		transaction category—comparable to primary and secondary
		market transactions—then:
		Through Data Field 10 , the reporting party could indicate the type
		of reported transaction:
		- Primary market transaction;
		- Secondary market transaction;
		- Offer of additional capacity.
		Through Data Field 11 , the reporting party could indicate the
		specific allocation mechanism applied to the transaction type
		identified in Data Field 10:
		- FCFS;
		- Ascending clock auction;
		- Uniform price auction;
		- Pro-rata;
		- Open season;
		- Etc.
Data Field 22 – Total price	Data Field 22 – Total price	The revised description of Data Field 22 effectively introduces a
		new data element, composed of two components:
Description:	Description:	



The field indicates the reserve price at time of the auction plus auction premium or regulated tariff in case of other allocation mechanism than auction. The price shall be specified as the total price per unit and the total contract value.

The field indicates the reserve price at time of the auction plus auction premium or regulated tariff in case of other allocation mechanism than auction.

The price shall be specified as the total price per unit and the total contract value.

- Total Unit Price an existing data field, and
- Total Contract Value a newly introduced component.

However, the "Total Contract Value" is already derivable from the information reported in Table 4.

It can be calculated directly from:

- Data Field 19: Quantity, and
- Data Field 22: Total Price (per capacity unit).

Formula: Total Contract Value = Total Unit Price × Quantity.



Summary for the response

The European Network of Transmission System Operators for Gas (ENTSOG), founded under Regulation (EC) 715/2009, has played a key role in integrating European gas markets by supporting technical interoperability and security of supply through coordinated infrastructure planning.

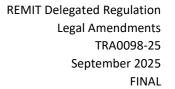
ENTSOG acts both as a Registered Reporting Mechanism (RRM), reporting fundamental data to ACER on behalf of European gas TSOs, and as an Inside Information Platform (IIP), facilitating the disclosure and publication of inside information under Regulation (EU) No 1227/2011. ENTSOG supports the European Commission's proposal for the REMIT Delegated Regulation on RRMs and IIPs, recognising their role in ensuring proportionality, technical feasibility, and alignment with existing reporting obligations, while enhancing legal certainty, data quality, and monitoring continuity.

ENTSOG and the gas TSOs provide the following feedback on the proposed REMIT Delegated Regulation:

- **Fast-track procedure for already registered RRMs and IIPs (Article 8):** Already registered RRMs and IIPs should be treated such that that documentation submitted at registration, in line with the RRM and IIP requirements at that time, is deemed sufficient. Only entirely new obligations require additional evidence. A final list should indicate which further documents are needed e.g., annual reports to preserve the fast-track character, avoid ambiguity, and provide a transparent basis.
- **Distinction between self-reporting and third-party RRMs:** Certain obligations designed for third-party RRMs are not appropriate for self-reporting entities. Clearer and more consistent provisions in the legal text are needed to ensure that this distinction is properly reflected and applied.
- **Proportionality of authorisation requirements:** Organisational and governance requirements should be limited to activities falling under REMIT, as certain elements may place an unnecessary burden on entities that are subject to reporting obligations.
- **Validation rules feasibility and scope:** The technical provisions on data validation for RRMs and IIPs, flagging of inside information, and automatic redirection of data impose operational and technical obligations that are burdensome and likely to require significant investment. These obligations go beyond established practices and raise questions about the proportionality and feasibility of implementation under Article 290 TFEU.



- **Avoid flagging inside information:** Requiring IIPs to publish incomplete or inaccurate flagged data contradicts Article 4a of REMIT and risks undermining market transparency.
- **Avoid establishing a register of invalid data:** This obligation would impose a disproportionate burden by forcing RRMs and IIPs to retain and track invalid data, duplicating existing validation processes that already ensure timely error correction.
- Client-centred approach for procedures for orderly substitution: Data transfers should minimise operational strain and protect commercially sensitive information while ensuring reporting continuity.
- **Clear guidance for RRMs established outside of the European Union:** A clear process is needed for RRMs outside the EU, where ACER may withdraw registration, requiring the designation of an EU-based RRM representative.
- **Curve type** for urgent market messages (UMMs) on unavailability of the gas capacities would increase the technical complexity of the reporting without delivering clear benefits, given the generally stable and predictable nature of the gas capacities.
- **Sufficient implementation time of 18 months** is needed to ensure a consistent, smooth, and effective implementation of the Regulation across all reporting entities, given that ACER's guidance is expected no earlier than 7 months after the publication, subject to Article 9.





Proposed amendments to the Commission Delegated Regulation on RRMs and IIPs

Whereas

Reference to Legal Text ENTSOG suggestion Rational/Argumentation (6) (6) ENTSOG and the gas TSOs raise concerns about the proposed the To ensure legal certainty and reduce the To ensure legal certainty and reduce the Agency's right to request the resubmission of documentation already provided during the registration process. In line with the administrative burden on IIPs and RRMs that administrative burden on IIPs and RRMs that were proposal to enable the RRMs and IIPs, already established in the were already established in the Union at the already established in the Union at the time of European Union, no additional requirements for resubmitting time of registration by the Agency, those IIPs registration by the Agency, those IIPs and RRMs already provided documentation should be imposed, since this and RRMs should not be required to should not be required to resubmit documents would hinder an implementation of the fast-track authorisation. resubmit documents that are already that are already available to the Agency. Therefore, available to the Agency. Therefore, the the authorisation process should contain specific authorisation process should contain specific provisions for them. Those IIPs and RRMs should provisions for them. Those IIPs and RRMs be eligible for a simplified authorisation process, should be eligible for a simplified insofar as the Agency confirms to the relevant IIPs authorisation process, insofar as the Agency and RRMs that it has already received, during the confirms to the relevant IIPs and RRMs that it registration process, all the information required for authorisation. However, the Agency should has already received, during the registration maintain the right to request the resubmission of process, all the information required for documentation already provided during the authorisation. However, the Agency should maintain the right to request the registration process, if it is necessary to ensure compatibility with its IT systems, particularly in resubmission of documentation already cases where technical updates are required. provided during the registration process, if it is necessary to ensure compatibility with its



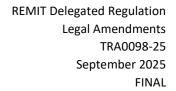
IT systems, particularly in cases where	
technical updates are required.	

Article 3 Identification and legal status of the applicant

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (2)	Paragraph (2)	Requesting detailed information on a company's group structure
The application shall contain the following	The application shall contain the following	for RRM/IIP authorisation is not directly relevant to its core
documentation and information:	documentation and information:	technical and compliance responsibilities. It creates additional
[]	[]	administrative work without significantly aiding the assessment of
(f) the identification of any subsidiaries of the	(f) the identification of any subsidiaries of the	operational capability.
applicant and the group structure	applicant and the group structure	

Article 4 Supporting documents

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	It is unclear what is meant by "all necessary information to the
The application shall include supporting	The application shall include supporting documents	Agency to demonstrate that they belong to the same legal entity."
documents describing compliance with the	describing compliance with the general	Articles 3(2)(a), 3(2)(c), and 3(5) already require the submission of
general organisational requirements for IIPs	organisational requirements for IIPs and RRMs set	documentation that sufficiently demonstrate the relationship
and RRMs set out in Articles 11 to 18 and the	out in Articles 11 to 18 and the policies and	between the RRM client and the RRM as part of the same legal
		entity.





policies and procedures that the applicant has in place to ensure orderly substitution pursuant to Article 38.

In addition to the documents referred to in the first subparagraph, IIP applicants shall include supporting documents describing compliance with the IIP requirements set out in Articles 19 to 25 and RRM applicants shall include supporting documents describing compliance with the RRM requirements set out in Articles 26 to 29.

Where a RRM applicant and its RRM clients belong to the same legal entity, the RRM applicant shall submit all necessary information to the Agency to demonstrate that they belong to the same legal entity. procedures that the applicant has in place to ensure orderly substitution pursuant to Article 38. In addition to the documents referred to in the first subparagraph, IIP applicants shall include supporting documents describing compliance with the IIP requirements set out in Articles 19 to 25 and RRM applicants shall include supporting documents describing compliance with the RRM requirements set out in Articles 26 to 29. Where a RRM applicant and its RRM clients belong to the same legal entity, the RRM applicant shall submit all necessary information to the Agency to demonstrate that they belong to the same legal entity.

Paragraph (2)

The application shall include the following: [...]

- (d) the organisational chart of the IIP or the RRM;
- (e) the programme of operations of the IIP or the RRM;
- [...]

(h) information on the procedures to ensure the orderly substitution of the IIP or the RRM

Paragraph (2)

[...]

The application shall include the following: [...]

(d) the organisational chart of the IIP or the RRM, limited to the functions and structures relevant to activities under Regulation (EU) No 1227/2011; (e) the programme of operations of the IIP or the RRM, limited to the activities carried out under Regulation (EU) No 1227/2011;

The requirement to provide a complete organisational chart and programme of operations for the IIP or the RRM is disproportionate and does not correspond to the function of the reporting entity. For the sake of proportionality and relevance, it would be more appropriate to limit this information to structures and activities within the scope of REMIT activities. The proposed provisions in Article 4 would require significant effort to describe of measures for compliance with regulations not directly related to REMIT and the performance of the RRMs and IIPs.



in case such substitution is the result of a withdrawal of the authorisation, including the procedures for the transfer of data and the redirection of the services provided to another IIP or RRM, as set out in Articles 38 and 39, including the related supporting documents;

(h) information on the procedures to ensure the orderly substitution of the IIP or the RRM in case such substitution is the result of a withdrawal of the authorisation, including the procedures for the transfer of data and the redirection of the services provided to another IIP or RRM, as set out in Articles 38 and 39, including the related supporting documents;

Paragraph (3)

The organisational chart of the IIP or RRM referred to in paragraph 2, point (d), shall:

- (a) display the group structure and ownership links between the parent undertaking and its subsidiaries or any other associated entities or branches, and indicate their respective activities;
- (b) indicate the legal name and address of the undertakings shown in the organisational chart;
- (c) identify the persons responsible for reporting of data records or operating the platform for the disclosure of information and submission of inside information reports to the Agency and provide descriptions of their tasks and business contact details.

Paragraph (3)

The organisational chart of the IIP or RRM referred to in paragraph 2, point (d), shall:

(a) display the group structure and ownership links between the parent undertaking and its subsidiaries or any other associated entities or branches, and indicate their respective activities; (b) indicate the legal name and address of the undertakings shown in the organisational chart; (c) identify the persons responsible for reporting of

data records or operating the platform for the disclosure of information and submission of inside information reports to the Agency and provide descriptions of their tasks and business contact details.

Explanation can be found in the rationale for Article 4(2).



Paragraph (4)

The programme of operations referred to in paragraph 2, point (e), shall describe in detail the operational framework, internal control mechanisms and the way in which regulatory compliance with this Regulation and Regulation (EU) No 1227/2011 is ensured. The description of the operational framework shall illustrate the business model of the applicant, including the services and products offered, and indicate any relevant outsourcing arrangements, in which case it shall specify how such outsourcing arrangements ensure compliance with the requirements laid down in this Regulation and with Regulation (EU) No 1227/2011. The description of the internal control mechanisms shall illustrate the mechanisms to ensure effective governance and risk management, procedures and systems for monitoring and managing risks, including the identification of potential risks and corresponding mitigation strategies. The description of regulatory compliance shall specify in detail how compliance with the requirements laid down in this

Paragraph (4)

The programme of operations referred to in paragraph 2, point (e), shall describe in detail the operational framework, internal control mechanisms and the way in which regulatory compliance with this Regulation and Regulation (EU) No 1227/2011 is ensured.

The description of the operational framework shall illustrate the business model of the applicant, including the services and products offered related to the current regulation and Regulation (EU) No 1227/2011, and indicate any relevant outsourcing arrangements, in which case it shall specify how such outsourcing arrangements ensure compliance with the requirements laid down in this Regulation and with Regulation (EU) No 1227/2011.

The description of the internal control mechanisms shall illustrate the mechanisms to ensure effective governance and risk management, procedures and systems for monitoring and managing risks, related to the activities carried out under Regulation (EU) No 1227/2011 including the identification of potential risks and corresponding mitigation strategies.

The description of regulatory compliance shall specify in detail how compliance with the requirements laid down in this Regulation, and in

It is not clear how the description of the "internal control mechanism" required by the third sub-paragraph of Article 4(4) is different from the information already provided under Article 4(2)(c, f, g, i) and with respect to Articles 13, 16, and 17.

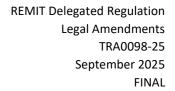
Similarly, the requirement to describe measures for "regulatory compliance" is overly broad and does not clearly specify how it supplements the information already required under Article 4.

To avoid unnecessary repetition and reduce the administrative burden on applicants, it is recommended that any requirements which duplicate or overlap with existing provisions be removed or clarified

For reasons of proportionality and relevance, it would be more appropriate to limit this information to structures and activities within the scope of REMIT activities, as outlined in the rationale for Article 4(2).



Regulation and in Regulation (EU) No 1227/2011 is ensured. Paragraph (5) IIP applicants shall provide to the Agency information about the time needed by the IIPs to disclose on their platform the information received from their IIP clients. IIP applicants shall provide to the Agency information about the manner in which they set the fees to be paid by their IIP clients in accordance with Article 25.	Regulation (EU) No 1227/2011, and in ACER REMIT documentation is ensured. Paragraph (5) IIP applicants shall provide to the Agency information about the time needed by the IIPs to disclose on their platform the information received from their IIP clients that has been successfully validated through their data validation system. IIP applicants shall provide to the Agency information about the manner in which they set the fees to be paid by their IIP clients in accordance with Article 25.	IIPs should provide information on the time required for internal processing and publication of data that has been successfully validated and accepted by their systems. This applies only to disclosure after successful validation and does not cover rejected or corrected data, which are beyond an IIP's control. Clarifying this distinction ensures IIPs are assessed solely on validated data, in line with Article 20 which references information "successfully validated through their data validation system".
Paragraph (6) RRM applicants shall provide supporting documents regarding the systems they have in place to ensure data transfers from other systems or platforms in accordance with Article 15. RRM applicants shall indicate the name of such systems or platform, and of any user facilities generating reportable data to the technical solution implemented by the applicant, including any data transformation.		The terms "other systems or platforms" and "any user facilities generating reportable data to the technical solution" are unclear. It should be specified whether this refers to systems used by RRM/IIP clients (e.g., MPs, OMPs, trade-matching systems) or to solutions implemented by the RRM/IIP or their service providers. To avoid differing interpretations and to clearly define the scope of the requirement, clarification is needed





Article 7 Request for additional information during the authorisation process

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Upon request by the Agency, applicants shall	Upon request by the Agency, applicants shall	Providing a predefined notification period would help ensure
provide additional information during the	provide additional information during the	transparency and legal certainty for the applicant. This would
examination of their application, where such	examination of their application, where such	allow the applicant to understand in a timely manner whether
information is necessary for the Agency to	information is necessary for the Agency to assess	additional information is needed, thereby avoiding unnecessary
assess the completeness of their application	the completeness of their application and the	delays in the assessment process and supporting a more efficient
and the applicants' compliance with the	applicants' compliance with the requirements set	and predictable assessment procedure.
requirements set out in this Regulation and	out in this Regulation and in Regulation (EU) No	
in Regulation (EU) No 1227/2011.	1227/2011. The Agency shall notify the applicant	
	within [a predefined period] if the application is	
	incomplete.	

Article 8 Application process for IIPs and RRMs already registered and established in the Union

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Article 8 - General	Inclusion of additional paragraph(s) or sub-	This is a requirement as provided in Article 9a of the Revised
	paragraph(s) within already proposed Articles, to	REMIT Regulation. Whereby, as per REMIT II Article 9a (5), ACER
	explicitly clarify the process for the nomination of	may withdraw the registration of existing RRMs if that entity is
	RRMs established in the Union, by existing RRM	established outside of the EU, meaning that such RRM entities
	entities that are not established in the Union in the	would need to designate an RRM representative based within the
	case that its registration is withdrawn by ACER.	



EU. In the current draft Delegated Regulation file, this compliance requirement is not explicitly referred to.

ENTSOG and the gas TSOs request a clear process for the designation of EU based entities nominated to act as an RRM on behalf of existing registered RRMs that are established outside of the EU.

In existing RRM cases where this compliance action is required, the non-EU based entity will already be registered as an RRM today under the existing REMIT Regulation. Therefore, we recommend a streamlined authorisation process where this compliance action applies to RRMs already registered as RRM under existing REMIT rules, and where in some cases the nominated entity itself may also be an existing registered RRM.

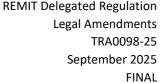
Paragraph (3)

The Agency shall inform the IIPs and RRMs referred to in paragraph 1 if additional information is necessary to assess the completeness of the application and the applicants' compliance with the requirements set out in this Regulation and in Regulation (EU) No 1227/2011.

Paragraph (3)

The Agency shall inform the IIPs and RRMs referred to in paragraph 1 if additional information is necessary to assess the completeness of the application and the applicants' compliance with the requirements set out in this Regulation and in Regulation (EU) No 1227/2011. The Agency shall confirm, without undue delay after submission of the application referred in par. 1, whether the applicant complies with some or all requirements for authorisation detailed in this Regulation. To

Clear guidance from the Agency is needed for consistency in the application process for an authorisation for RRMs and IIPs that are already established in the Union. Providing explicit guidance would reduce administrative burden and support a proportionate authorisation process.



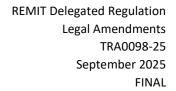
that extent, applicants shall be discharged from proving compliance with those requirements for the purpose of their authorisation. The Agency shall provide specific guidelines regarding the requirements for which RRMs/IIPs already established in the Union, will be excluded

from providing compliance.

european network of transmission system operators for gas

Article 9 Guidance by the Agency

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
No later than [OP: please insert the date = 7	No later than [OP: please insert the date = 7	To ensure that the guidance is proportionate and technically
months after the date of entry into force of	months after the date of entry into force of this	feasible to implement, thorough consultation with relevant
this Regulation], the Agency shall provide	Regulation], the Agency shall provide guidance on	parties is needed.
guidance on the following:	the following:	To avoid ambiguity, it should be clarified that Recital (10) and
(a) the technical process for the testing phase	(a) the technical process for the testing phase as	Article 9(c) refer to ACER's technical specifications for the
as referred to in Article 5(1);	referred to in Article 5(1);	verification of data, not technical standards, in accordance with
(b) the application process for IIPs and RRMs	(b) the application process for IIPs and RRMs	Article 4(2)(i) and Article 13(1).
already registered and established in the	already registered and established in the Union as	
Union as referred to in Article 8(1);	referred to in Article 8(1);	
(c) the data validation principles and	(c) the data validation principles and processes as	
processes as referred to in Article 12(1) and	referred to in Article 12(1) and (2) by providing	
(2) by providing technical standards for the	technical standards specifications for the	
verification of data;	verification of data;	

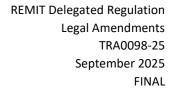




sures referred to in	(d) the security measures referred to in Article
d);	13(1), point (d);
report on unplanned	(e) the format of the report on unplanned
ion as referred to in	downtime or disruption as referred to in Article
	18(3);
ess set out in Article	(f) the flagging process set out in Article 24(4), if
	applicable;
to identify completeness,	(g) the mechanisms to identify completeness,
us errors in inside	omissions and obvious errors in inside information
and data records as	reports and data records as referred to in Article
23(1) for IIPs and Article	23(1) for IIPs and Article 27(1) for RRMs;
	(h) the format of the annual report as referred to
annual report as	in Article 33(1). The Agency shall explain the
33(1).	technical aspects of the information to be provided
	as set out in this Regulation in guidelines, after
	consulting relevant parties.
	d); report on unplanned cion as referred to in ess set out in Article to identify completeness, us errors in inside and data records as 23(1) for IIPs and Article annual report as

Article 10 Decision on the authorisation and related safeguards

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (2)	Paragraph (2)	Explanation can be found in the rationale for Article 7.
When the Agency deems the application	When the Agency deems the application complete,	
complete, it shall without undue delay notify	it shall without undue delay notify the applicant.	
the applicant.		

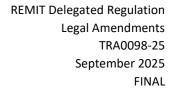




The Agency shall notify the applicant within [a predefined period] if the application is incomplete.

Article 14 Security incidents

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	Apart from the systems containing confidential information within
IIPs and RRMs shall take the actions listed in	IIPs and RRMs shall take the actions listed in	the scope of REMIT, RRMs may operate additional systems. It is
paragraph 2 in case of an occurrence of any	paragraph 2 in case of an occurrence of any of the	understood that actions under paragraph 1, points (a), (b), and (c),
of the following incidents:	following incidents if the confidential information	should be required only if the confidential information that falls
(a) misuse or unauthorised access of the IIP's	falling within the scope of Regulation (EU) No	within the scope of Regulation (EU) No 1227/2011 is affected.
or RRM's IT systems;	1227/2011 is affected:	
(b) incidents against information systems, as	[]	
defined in Article 6(6) of Directive (EU)		
2022/2555;		
(c) unauthorised disclosure of confidential		
information flowing from IIP clients and RRM		
clients to the IIP or RRM and from the IIP or		
RRM to the Agency;		
(d) breach of the confidentiality, integrity,		
availability, authenticity, accountability and		
reliability of the information processed		
within the IIPs and RRMs systems and, for		
IIPs, leakages of the processed information		
before its publication;		

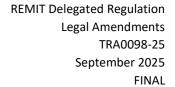




(e) any event that would impede or impact	
the non-repudiation of the data.	

Article 16 Conflicts of interest

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	The requirement may appear disproportionate. It is understood
IIPs and RRMs shall maintain effective	IIPs and RRMs shall maintain effective	that when an RRM and its clients belong to the same legal entity,
administrative arrangements, designed to	administrative arrangements, designed to prevent	the conflict of interest rules for independent clients do not apply.
prevent conflicts of interest with their IIP	conflicts of interest with their IIP clients and RRM	Since the RRM reports only its own data, the risk of external
clients and RRM clients. Such arrangements	clients. Such arrangements shall include policies	conflicts is not present. This interpretation supports a
shall include policies and procedures for	and procedures for identifying, managing and	proportionate approach by reducing unnecessary obligations
identifying, managing and disclosing existing	disclosing existing and potential conflicts of	while maintaining fair and transparent data handling.
and potential conflicts of interest and shall:	interest and shall:	
(a) ensure that the relevant IIP clients and	(a) ensure that the relevant IIP clients and RRM	
RRM clients are aware of those policies and	clients are aware of those policies and procedures;	
procedures;	(b) ensure the separation of duties and business	
(b) ensure the separation of duties and	functions within the IIP or RRM, including through:	
business functions within the IIP or RRM,	(i) measures to prevent or control the exchange of	
including through:	information where a risk of conflicts of interest	
(i) measures to prevent or control the	may arise;	
exchange of information where a risk of	(ii) the separate supervision of relevant persons	
conflicts of interest may arise;	whose main functions involve interests that are	
(ii) the separate supervision of relevant	potentially in conflict with those of IIP clients or	
persons whose main functions involve	RRM clients;	





interests that are potentially in conflict with those of IIP clients or RRM clients;

- (iii) measures to remedy potential or existing conflicts of interest;
- (c) map any existing and potential conflicts of interest and list them in an inventory, which shall contain their description, identification, prevention, management and disclosure.

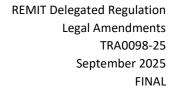
(iii) measures to remedy potential or existing conflicts of interest;

(c) map any existing and potential conflicts of interest and list them in an inventory, which shall contain their description, identification, prevention, management and disclosure.

Where an RRM and its clients belong to the same legal entity, the RRM shall not be required to comply with the requirements set out in this paragraph.

Article 17 Business continuity and back-up facilities

	Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
	Paragraph (3)	Paragraph (3)	As it is unclear which annual checks are specifically referred to
	IIPs and RRMs shall have in place robust	IIPs and RRMs shall have in place robust	within the scope of "evaluating the IIPs' and RRMs' technical
١	operational risk controls and procedures to	operational risk controls and procedures to secure	infrastructures," clarification is necessary regarding the exact
\	secure the availability of adequate resources	the availability of adequate resources and back-up	meaning of this requirement.
	and back-up facilities. Such controls and	facilities. Such controls and procedures shall be	
	procedures shall be documented within an	documented within an operational risk policy or an	The scenario where an IIP's backup solution, referred to under (i),
	operational risk policy or an operational risk	operational risk framework which ensures that	relies on a contractual arrangement with another IIP authorised
	framework which ensures that disruptions to	disruptions to the provided services are minimised.	by the Agency is already implemented in practice by GIE and
	the provided services are minimised. Such	Such policy or framework shall include the	ENTSOG. This setup reflects the significant overlap in the
		following: []	membership of both associations and was initiated and driven by





policy or framework shall include the following: [...]

- (c) automated monitoring and alert systems to track the availability of all system components and services, providing immediate notifications to the IIP clients and RRM clients regarding any service disruptions;
- (d) redundancy of hardware components and network infrastructure, allowing failover to backup systems, including:

[...]

- (e) the conduct of periodic reviews, at least annually, evaluating the IIPs' and RRMs' technical infrastructures and associated policies and procedures, including business continuity arrangements and, for IIPs, information security arrangements; (f) comprehensive data back-up measures ensuring no data losses, including retention of data reported to the Agency in the last five years after the termination of the corresponding event for IIPs and five years for RRMs;
- (g) effective business continuity arrangements addressing unplanned events, including the following:

(c) automated monitoring and alert systems to track the availability of all system components and services, providing immediate notifications to the IIP clients and RRM clients regarding any service disruptions, where an RRM and its clients belong to the same legal entity, the RRM shall not be required to comply with the requirement;

(d) redundancy of hardware or virtual components and network infrastructure, allowing failover to backup systems, including:

[...]

- (e) the conduct of periodic reviews, at least annually on triennial basis, evaluating the IIPs' and RRMs' technical infrastructures and associated policies and procedures, including business continuity arrangements and, for IIPs, information security arrangements;
- (f) comprehensive data back-up measures ensuring no data losses, including retention of data reported to the Agency in the last five two years after the termination of the corresponding event for IIPs and five years for RRMs;
- (g) effective business continuity arrangements addressing unplanned events, including the following:
- (i) arrangements for the continuity of the processes which are critical to ensuring the

their members with the aim of improving cost-efficiency and centralizing the publication of UMMs from infrastructure operators (TSOs, SSOs, LSOs). This enhances not only efficiency but also transparency, by making inside information issued by the infrastructure operators easily accessible to the market. The conditions for using the mutual backup between the GIE IIP and the ENTSOG TP IIP were developed, coordinated, and approved by their respective members.

In light of this experience, we wish to highlight that for the scenario when the backup solution of an IIP is based on contractual arrangement with another IIP authorised by the Agency, the proposed requirement for "automated redirection" of data submissions to another IIP as a backup solution oversimplifies the diverse and complex technical arrangements used by IIPs for data exchange with their clients. IIPs typically support multiple submission channels, including both manual interfaces (e.g., web forms) and various automated systems (such as SFTP, AS4, web services, APIs, RSS, etc.), which cannot be seamlessly redirected without prior technical configuration.

ENTSOG and the gas TSOs understand that the aim of the provision is to ensure timely and efficient continuity of data disclosure in the event of an incident. However, the requirement for "automated redirection" appears only technically feasible for manual UMM publication and does not account for the technical



(i) arrangements for the continuity of the processes which are critical to ensuring the effectiveness of data reporting services, including escalation procedures, relevant outsourced activities or dependencies on external providers, which as regards an IIPs back-up infrastructure, may include contractual arrangement with another IIP authorised by the Agency where IIP clients will be automatically redirected for the disclosure of their information in case of an incident, at no additional cost for the IIP client;

effectiveness of data reporting services, including escalation procedures, relevant outsourced activities or dependencies on external providers, which as regards an IIPs back-up infrastructure, may include contractual arrangement with another IIP authorised by the Agency where IIP clients will be automatically redirected have access to both IIPS for the disclosure of their information in case of an incident, at no additional cost for the IIP client;

limitations and integration challenges associated with automated data flows. Therefore, we recommend that the provision be rewarded more generally, avoiding a strict focus on the manual data submission and automated redirection.

Alternative solutions, already implemented by the GIE, ENTSOG and their members - such as:

- pre-configured dual connections for automated data exchange with both platforms; and
- pre-defined user accounts at both IIPs, should be allowed.

These setups ensure cost efficiency, continuity and reliability, provided that the affected IIP informs its clients of the disruption and guides them to the backup IIP during the incident.

Paragraph (4)

IIPs and RRMs shall ensure that any deficiencies identified during the review referred to in paragraph 3, point (e), are remedied.

Paragraph (4)

IIPs and RRMs shall ensure that any deficiencies identified during the review referred to in paragraph 3, point (e), are mitigated and remedied, to the extent possible.

While the requirement for RRM/IIP periodic reviews and remediation of deficiencies is important for maintaining robust infrastructure and security, it should be noted that international technical standards (such as ISO/IEC 27001) acknowledge that not all identified risks or deficiencies must be fully resolved. In cases where remediation is not technically feasible or would require disproportionate costs, it should be acceptable to implement appropriate risk mitigation measures.

This approach ensures that resources are used efficiently while still maintaining an acceptable level of risk and system integrity.



Paragraph (6)

IIP services related to the disclosure and publication of information and submission of inside information reports shall be available at least 99,5 % of the time. The same applies where IIP services or parts thereof are outsourced to external providers.

instructions on how to use the alternative

Paragraph (6)

IIP services related to the disclosure and publication of information and submission of inside information reports shall be available at least 99,5 % 99% of the time, excluding planned maintenance periods scheduled within a reasonable timeframe. The same applies where IIP services or parts

thereof are outsourced to external providers.

A 99% availability threshold, excluding planned maintenance scheduled within a reasonable timeframe, is sufficient to ensure reliable and timely access to IIP services. This level aligns with standard industry expectations and supports uninterrupted market transparency without introducing unnecessary rigidity.

Article 18 Planned maintenance or unplanned downtime or other disruption

Reference to Legal Text ENTSOG suggestion **Rational/Argumentation** Paragraph (1) Paragraph (1) In the event of unplanned unavailability, the requirement for IIPs IIPs shall establish processes to notify, on IIPs shall establish processes to notify, on their to notify their clients via the IIP website might not be feasible if the IIP website itself is unavailable. In addition, the term 'publication' their website, their IIP clients of any planned website, their IIP clients of any planned does not appear in the definition of IIP in Article 2(17) of Regulation maintenance activities impacting the maintenance activities impacting the availability of (EU) No 1227/2011. Furthermore, while IIPs facilitate the disclosure availability of IIP services related to the IIP services related to the disclosure of information of inside information, providing instructions to IIP clients does not disclosure of information and submission of and submission of inside information reports. The fall within the scope of responsibilities of an IIP. inside information reports. The notification notification shall be made at least five working shall be made at least five working days prior days prior to the start of the maintenance window. to the start of the maintenance window. It It shall indicate the scheduled service interruption shall indicate the scheduled service period and shall include instructions on how to use interruption period and shall include the alternative means for the disclosure of inside



means for the disclosure of inside information or submission of inside information reports.

IIPs shall also establish processes to notify, on their website, their IIP clients of any unplanned downtime or other disruption impacting the availability of IIP services related to the disclosure of information and submission of inside information reports. Each IIP client shall be notified individually, as soon as possible after the disruption happens, and shall be given instructions on how to use the alternative means for the disclosure of information.

information or submission of inside information reports.

IIPs shall also establish processes to notify, if technically feasible, on their website, their IIP clients of any unplanned downtime or other disruption impacting the availability of IIP services related to the disclosure of information and submission of inside information reports. Each IIP client shall be notified individually, as soon as possible after the disruption happens, and shall be given instructions on how to use the alternative means for the disclosure of information.

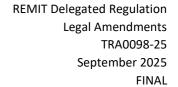
Paragraph (3)

IIPs and RRMs shall notify the Agency of any unplanned downtime or other disruption affecting their ability to comply with the requirements laid down in Articles 11 to 29 within 24 hours of becoming aware of the disruption. No later than one month after becoming aware of the disruption, IIPs and RRMs shall submit a report to the Agency detailing the causes of the disruption and the actions taken to prevent any reoccurrence.

Paragraph (3)

IIPs and RRMs shall notify the Agency of any unplanned downtime or other disruption affecting their ability to comply with the requirements laid down in Articles 11 to 29 within 24 hours one working day of becoming aware of the disruption. No later than one month after becoming aware of the disruption, IIPs and RRMs shall submit a report to the Agency detailing the causes of the disruption and the actions taken to prevent any reoccurrence.

A timeline of one working day aligns with standard business practices and ensures that the requirement remains feasible for RRMs and IIPs to comply with.





Paragraph (6)

IIPs and RRMs shall notify the Agency of any unplanned downtime or other disruption affecting their ability to comply with the requirements laid down in Articles 11 to 29 within 24 hours of becoming aware of the disruption. No later than one month after becoming aware of the disruption, IIPs and RRMs shall submit a report to the Agency detailing the causes of the disruption and the actions taken to prevent any reoccurrence.

Paragraph (6)

IIPs and RRMs shall notify the Agency of any unplanned downtime or other disruption affecting their ability to comply with the requirements laid down in Articles 11 to 29 within 24 hours—one working day of becoming aware of the disruption. No later than one month after becoming aware of the disruption, IIPs and RRMs shall submit a report to the Agency detailing the causes of the disruption and the actions taken to prevent any reoccurrence. Where an RRM and its clients belong to the same legal entity, the RRM shall be exempt from the obligations set out in this paragraph, provided that the RRM submits a contingency report in the event of any service disruption.

The requirement appears disproportionate for the self-reporting RRMs. A timeline of one working day aligns with standard business practices and ensures that the requirement remains feasible for RRMs and IIPs to comply with.

Article 19 Operation of the platform

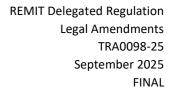
Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (4)	Paragraph (4)	The download functionality of the IIPs must be designed to
The IIP platform shall allow for:	The IIP platform shall allow for:	prevent excessive system load, abuse, or denial-of-service risks,
[]	[]	particularly under high-demand conditions to support this,
(b) the downloading of filtered information	(b) the downloading of filtered information in a	appropriate safeguards—such as rate limiting and session
in a format that conforms to a standard	manner that preserves the secure operation and	management—could be enabled where necessary.



structure and naming convention, in line with	availability of the IIP, in a format that conforms to	Ensuring the availability and performance of the IIP in fulfilling its
Annex II;	a standard structure and naming convention, in	primary role—namely, the timely and reliable disclosure of inside
[]	line with Annex II;	information—should remain the main priority. Any additional
	[]	functionalities, such as filtering and downloading selected
		information, should be introduced in a way that preserves the
		platform's core resilience and security.

Article 20 Submission of inside information reports

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
IIPs shall have in place a procedure and the	IIPs shall have in place a procedure and the	A timeline of one working day aligns with standard business
technical means to report to the Agency, in a	technical means to report to the Agency, in a	practices and ensures that the requirement remains feasible for
standard electronic format established by the	standard electronic format established by the	compliance.
Agency in line with Annex II, all information	Agency in line with Annex II, all information	
disclosed on their platform that has been	disclosed on their platform that has been	
successfully validated through their data	successfully validated through their data validation	
validation system, including any subsequent	system, including any subsequent modifications,	
modifications, no later than one day	no later than one working day following the	
following the disclosure or modification.	disclosure or modification.	



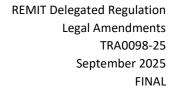


Article 22 Assessment of inside information reports before submission to the Agency

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
The IIP data validation systems referred to in	The IIP data validation systems referred to in	Clarification is needed for point (iii) on the procedure by which the
Article 12 shall:	Article 12 shall:	authentication of the source can be verified.
[]	[]	
(d) enable the authentication of the source of	(d) enable the authentication of the source of	In case of M2M/automated provision of the data from the client's
information and verify the following:	information and verify the following:	system to the IIP, the authorisation is not relevant.
(i) the identity of the IIP client;	(i) the identity of the IIP client;	
(ii) the identity of any other person	(ii) the identity of any other person submitting	
submitting information on behalf of the IIP	information on behalf of the IIP client;	
client;	(iii) that persons submitting information on behalf	
(iii) that persons submitting information on	of an IIP client are properly authorised to do so.	
behalf of an IIP client are properly authorised		
to do so.		

Article 23 Detection and correction of invalid inside information reports before submission to the Agency

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (2)	Paragraph (2)	The requirement for IIPs to maintain a register of invalid
IIPs shall maintain a register of invalid data	IIPs shall maintain a register of invalid data	submissions cannot be applied effectively to clients submitting
submitted by their IIP clients. That register	submitted by their IIP clients. That register shall	data manually, as they receive immediate feedback and can
shall include information on whether the IIP	include information on whether the IIP client has	correct errors before finalizing.





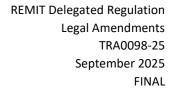
client has successfully submitted the correct data. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which IIP clients submitted invalid data as well as the identity of such clients.

successfully submitted the correct data. The
Agency may access the register and may notify the
relevant national regulatory authorities of
instances in which IIP clients submitted invalid data
as well as the identity of such clients.

Such a register would only record automated submissions, creating unequal treatment between manual and automated reporting and undermining fairness. It would also impose significant administrative burden without improving data quality or market transparency.

Article 24 Receipt of inside information reports submitted by IIPs

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	The provision of a receipt by ACER is essential for IIP operations,
When receiving inside information reports,	When receiving inside information reports, the	including the sequencing of follow-up reports and the correction
the Agency shall issue receipts to the IIPs.	Agency shall issue receipts to the IIPs, immediately	of any erroneous data. Immediate issuance of the receipt is crucial
Those receipts shall include at least the	and without delay. Those receipts shall include at	to avoid cascading validation issues, such as rejections due to
following information:	least the following information:	disrupted sequencing or file naming inconsistencies.
(a) the identification of the submitted inside	(a) the identification of the submitted inside	The proposed paragraph (c) of Article 24(1) clarifies that receipts
information report;	information report;	must include a validity check, rather than acknowledging delivery.
(b) an indication of whether the inside	(b) an indication of whether the inside information	This would ensure that IIPs receive prompt feedback, allowing
information report has been successfully	report has been successfully collected by the	them to address any errors within the reporting deadlines.
collected by the Agency.	Agency.	
	(c) compliance of the reported data with the	
In case the information has not been	validation rules of the Agency.	
successfully collected by the Agency due to		





an error, the receipt shall also indicate the
information affected by the error and, if
possible, the cause of the error.

In case the information has not been successfully collected by the Agency due to an error, the receipt shall also indicate the information affected by the error and, if possible, the cause of the error.

Paragraph (2)

In case the error referred to in paragraph 1, second subparagraph, is attributable to the IIP, the IIP shall resubmit the corrected inside information report within two working days. If the error is attributable to the IIP clients, the IIP shall provide those clients with guidance on how to correct the inside information report and shall subsequently submit the corrected inside information report to the Agency within five working days.

Paragraph (2)

In case the error referred to in paragraph 1, second subparagraph, is attributable to the IIP, the IIP shall resubmit the corrected inside information report within two working days.

If the error is attributable to the IIP clients, the IIP shall provide those clients with guidance on how to correct the ACER's receipt for the erroneous inside information report or information about the error indicated by the Agency and shall subsequently submit the corrected inside information report to the Agency within five working days—, following its successful acceptance and validation in the IIP's system.

IIPs are required to implement automated alert systems (Article 24(3)) for automation of the process. It is possible for the IIP to inform the client about the rejection, the reason for rejection specified in ARIS receipt, and eventually - about the problematic data fields.

The IIP can provide validation feedback (e.g., error messages or rejection receipts), but responsibility for correcting client-caused errors lies with the client.

The five-working day resubmission period should start only after a corrected report is successfully validated in the IIP system, as the IIP cannot control client responsiveness. Timely submission to ACER can only be ensured once the corrected report is accepted by the IIP.

Paragraph (4)

By way of derogation from Article 12(3), for the purposes of ensuring timely and efficient disclosure of information, the IIP may publish and submit inaccurate or incomplete inside information reports to the Agency, provided

Paragraph (4)

By way of derogation from Article 12(3), for the purposes of ensuring timely and efficient disclosure of information, the IIP may publish and submit inaccurate or incomplete inside information reports to the Agency, provided that the content in

The proposed mechanism that allows IIPs to publish and report inside information that is inaccurate or incomplete, provided the content is deemed relevant for market participants' trading choices, raises significant concerns.



that the content in the reports is relevant for market participants' trading choices. In such cases, the inaccurate or incomplete information in the report shall be flagged by the IIP upon the publication and submission of the report to the Agency. In case the information needs to be corrected, IIPs shall collaborate with their IIP clients to correct it. Once the information is corrected, IIPs shall publish it and resubmit it to the Agency as soon as it is technically possible.

the reports is relevant for market participants' trading choices. In such cases, the inaccurate or incomplete information in the report shall be flagged by the IIP upon the publication and submission of the report to the Agency. In case the information needs to be corrected, IIPs shall collaborate with their IIP clients to correct it. Once the information is corrected, IIPs shall publish it and resubmit it to the Agency as soon as it is technically possible.

IIPs are technical service providers and neither equipped nor mandated to assess the market relevance of the content submitted by their clients. Such evaluations involve legal and contextual judgments, which depend on various factors such as specific market dynamics, the nature of the asset, timing, and the expectations of market participants. Imposing this conditionality may lead to risks such as inconsistent treatment, legal liability, and delays in reporting.

Moreover, this approach contradicts Article 4a of REMIT, which requires that IIPs publish inside information as close to real time as technically possible, implement mechanisms to check reports for completeness and obvious errors, request corrections, and treat all inside information in a non-discriminatory manner:

- "Make public the inside information as required under Article 4(1) as close to real time as is technically possible;
- The IIP shall have mechanisms in place allowing inside information reports to be quickly and effectively checked with regard to their completeness, to identify omissions and obvious errors, and to request receipt of a corrected version of such reports;
- To treat all inside information collected in a nondiscriminatory manner."

The introduction of a relevance-based judging and flagging system violates these requirements by introducing risks of delays,

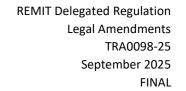


subjectivity, and unequal treatment of data. It could result in inconsistent disclosure practices within individual IIPs and across different platforms.

This approach might also challenge the efforts of ACER and IIPs to establish robust, harmonized validation systems, and seems to run counter to the goal of consistent, rule-based data processing. The requirement for conditionality in invalidation appears to contradict the primary role of the IIP as a technical disclosure platform.

Allowing flagged publication of incomplete or inaccurate data would compromise data quality, lead to the dissemination of unreliable information, and cause confusion - ultimately impacting market confidence and transparency. Expecting IIPs to make evaluations for "trading relevance" of the posted information introduces significant legal uncertainty and liability risks.

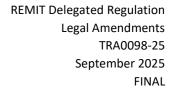
For these reasons, ENTSOG and the gas TSOs strongly recommend removing the requirement for IIPs to assess the relevance of incomplete or inaccurate information, and to avoid publishing such content. The processing of inside information should remain straightforward, objective and rule-based, with IIPs handling only reports that meet established validation criteria.





Article 26 Assessment of data records before submission

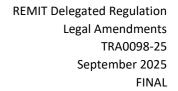
Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
The RRMs' data validation systems referred	The RRMs' data validation systems referred to in	For the sake of cost-effectiveness, it is proposed that RRMs
to in Article 12 shall:	Article 12 shall:	implement only the validation rules established by the Agency.
(a) detect whether the data record contains	(a) detect whether the data record is submitted in	This approach avoids unnecessary duplication and reduces
all the required information as set out in	accordance with the validation rules established by	operational and financial burdens on RRMs.
[Commission Implementing Regulation (EU)	the Agency;	
No 1348/2014] and in the related manuals	[]	RRMs should retain the flexibility to implement additional
adopted by the Agency;	(c) enable the authentication of the source of	validation rules at their discretion, if they deem them necessary
[]	information and verify the following:	for internal quality assurance or operational purposes.
(c) enable the authentication of the source of	(i) the identity of the RRM client;	To ensure sufficient time for technical adjustments and system
information and verify the following:	(ii) the identity of any other person submitting	updates, it is recommended that any new or updated validation
(i) the identity of the RRM client;	information on behalf of the RRM client;	rules established by the Agency be applied no later than nine to
(ii) the identity of any other person	(iii) that persons submitting information on behalf	twelve months following their publication. This timeframe
submitting information on behalf of the RRM	of a RRM client are properly authorised to do so.	balances regulatory objectives with the practical realities of
client;		system implementation and testing.
(iii) that persons submitting information on		
behalf of a RRM client are properly		The scenario involving "other person submitting information on
authorised to do so.		behalf of the RRM client" is not clear.
		In case of M2M/automated data provision from the client's
		system to the RRM, the authorisation is not relevant.



european network of transmission system operators for gas

Article 27 Detection and correction of invalid data records before submission to the Agency

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (2)	Paragraph (2)	ENTSOG and the gas TSOs suggest deleting the proposal for RRMs
RRMs shall maintain a register of data	RRMs shall maintain a register of data records	to maintain a register of invalid data. This obligation would
records containing invalid data submitted by	containing invalid data submitted by their RRM	impose a disproportionate operational burden, requiring RRMs to
their RRM clients. That register shall include	clients. That register shall include information on	retain invalid data and track its correction across all future
information on whether the RRM clients	whether the RRM clients have successfully	submissions—an effort that is both resource-intensive and
have successfully submitted the corrected	submitted the corrected data records. The Agency	duplicative of existing internal validation processes. These
data records. The Agency may access the	may access the register and may notify the	processes already ensure timely error detection and correction
register and may notify the relevant national	relevant national regulatory authorities of	without the need for additional tracking mechanisms.
regulatory authorities of instances in which	instances in which RRM clients submitted invalid	For the self-reporting RRMs, the provisions on maintaining such a
RRM clients submitted invalid data as well as	data as well as the identity of such clients.	register are not relevant, as generations and validations are
the identity of such clients.		occurring within one process and there are no submissions to the
Where an RRM and its clients belong to the		RRM function that could be rejected internally and populated in
same legal entity, the RRM shall maintain a		the register.
register of data records containing invalid		
data. That register shall include information		
on whether the RRM has successfully		
submitted the corrected data records to the		
Agency. The Agency may access the register		
and may notify the relevant national		
regulatory authorities of instances in which		
RRM clients submitted invalid data as well as		
the identity of such clients.		





Article 28 Data reconciliation

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (3)	Paragraph (3)	The provision is not applicable to the self-reporting RRMs.
RRMs shall request that the organised	RRMs shall request that the organised market	
market place provide the missing	place provide the missing corresponding data	
corresponding data records from the other	records from the other party to the transaction.	
party to the transaction.	Where an RRM and its clients belong to the same	
	legal entity, the RRM shall not be required to	
	comply with the requirements set out in this	
	paragraph.	

Article 29 Receipt of data records submitted by RRMs

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	The provision of a receipt by ACER to the RRMs is a critical for
The Agency shall issue receipts of reported	The Agency shall issue receipts of reported data	RRMs operations in general (e.g., sequencing of next reports) and
data records to RRMs. Those receipts shall	records to RRMs, immediately and without delay.	for the rectification of the affected erroneous data. It is essential
include at least the following information:	Those receipts shall include at least the following	that the receipt is issued immediately upon submission to ensure
(a) the identification of the reported data	information:	smooth and timely processing of the subsequent submissions.
record;	(a) the identification of the reported data record;	Delays in ARIS receipts, particularly in the case of a rejection, can
	(b) an indication of whether the data record has	lead to cascading validation issues, including the rejection of
	been successfully collected by the Agency.	



(b) an indication of whether the data record has been successfully collected by the Agency.

In case the data record has not successfully been collected by the Agency due to an error, the receipt shall also indicate the data affected by the error and, if possible, the cause of the error.

(c) compliance of the reported data with the validation rules of the Agency.

In case the data record has not successfully been collected by the Agency due to an error, the receipt shall also indicate the data affected by the error and, if possible, the cause of the error.

subsequent reports, for instance - due to disrupted sequencing and inconsistencies in file naming.

The newly proposed paragraph (c) of Article 29(1) aims to clarify that these receipts must include a validity check and should not be limited to mere acknowledgments of delivery. To allow RRMs to correct any errors within the applicable reporting deadlines, immediate and meaningful feedback from ACER is essential.

Paragraph (2)

In case the error referred to in paragraph 1, second subparagraph, is attributable to the RRM, the RRM shall resubmit the corrected data record to the Agency within two working days.

If the error is attributable to the RRM clients, the RRMs shall provide them with guidance on how to correct the data record, and subsequently submit the corrected data record to the Agency within five working days.

Paragraph (2)

In case the error referred to in paragraph 1, second subparagraph, is attributable to the RRM, the RRM shall resubmit the corrected data record to the Agency within two working days.

If the error is attributable to the RRM clients, the RRMs shall provide them with guidance on how to correct the ACER's receipt for the erroneous data record or information about the error indicated by the Agency, and subsequently submit the corrected data record to the Agency within five working days, following its successful acceptance and validation in the RRM's system.

The requirement that the RRM must provide guidance to clients on how to correct each erroneous report is operationally impractical. While the RRM can and provide feedback on validation outcomes (e.g. error messages or rejection receipts, similar to ACER's practice), when the error is attributable to the RRM clients, the responsibility for correcting the report lies with the client. The RRMs cannot provide tailored guidance for each individual error scenario, especially considering the volume and complexity of data handled.

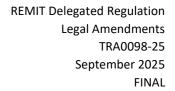
Furthermore, the five-working day submission period should not begin from the moment of initial rejection but only after a corrected report has been successfully validated within the RRM's system. The RRM cannot control the timeliness or responsiveness of its clients in correcting errors and therefore cannot be held



accountable for delays outside of its control. The RRM can only guarantee timely submission to ACER once the corrected report is validated and accepted by its system.

Article 30 Compliance monitoring and assessment

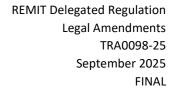
Reference to Le	gal Text	ENTSOG suggestion	Rational/Argumentation
Upon request by	y the Agency, IIPs and RRMs	Upon request by the Agency, IIPs and RRMs shall	The timeframe set by the Agency should be reasonable and
shall provide, w	ithin the timeframe indicated	provide, within a reasonable and proportional to	proportionate, allowing IIPs and RRMs sufficient time to collect
by the Agency, i	nformation necessary for the	the request timeframe indicated by the Agency,	and provide accurate information. This ensures fairness, avoids
assessment of t	heir continued compliance	information necessary for the assessment of their	unnecessary administrative burden, and supports efficient use of
with this Regula	tion and with Regulation (EU)	continued compliance with this Regulation and	resources.
No 1227/2011.	The Agency may also request	with Regulation (EU) No 1227/2011. The Agency	
information reg	arding the IIP client or RRM	may also request information regarding the IIP	
client on whose	behalf the IIP or the RRM is	client or RRM client on whose behalf the IIP or the	
reporting. In suc	ch case, the IIP or RRM shall	RRM is reporting. In such case, the IIP or RRM shall	
liaise with the re	elevant IIP client or RRM	liaise with the relevant IIP client or RRM client to	
client to the ext	ent necessary to obtain the	the extent necessary to obtain the requested	
requested infor	mation.	information.	





Article 31 Material changes after authorisation

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	If the change is related only to Article 6(3)(a) "the manner in which
When IIPs or RRMs or their IIP clients or RRM	When IIPs or RRMs or their IIP clients or RRM	the submission of inside information reports and the reporting of
clients initiate any material changes as	clients initiate any material changes as referred to	data records is carried out", the update or resubmission of the
referred to in Article 6(3), the IIPs or RRMs	in Article 6(3), the IIPs or RRMs shall notify the	documents under Article 4 is not needed.
shall notify the Agency of such changes no	Agency of such changes no later than five working	
later than five working days after the change	days after the change has taken place. The	
has taken place. The notification shall	notification shall describe the change in detail and	
describe the change in detail and be	be accompanied by the relevant supporting	
accompanied by the relevant supporting	documents as referred to in Article 4-, if applicable.	
documents as referred to in Article 4.		
Paragraph (2)	Paragraph (2)	It is understood that the Agency seeks to be informed of process
RRMs shall also notify the Agency of any	RRMs shall also notify the Agency of any changes	changes in a timely manner. However, providing all the
changes to the reported volumes, prior to	to the reported volumes, prior to their	information set out in Article 4 would require a substantial effort
their implementation.	implementation-, where such changes are known	from both TSOs and the Agency. Therefore, it is preferable to
	to the RRM and fall within its operational control.	provide only information on changes that are relevant to the
		communication and reporting of data to the Agency under REMIT.
		This primarily includes changes to contact persons, the data
		format, or the interface with ACER.
Paragraph (3)		The reference to non-compliance with "any" of the requirements
The Agency shall respond to the IIP or RRM		set out in this Regulation and in Regulation (EU) No 1227/2011 is
within 15 working days, informing them		too broad and overreaching, particularly when it implies that even

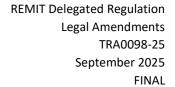




whether the change is in compliance with the	minor or technical non-compliances might lead to a decision
requirements set out in this Regulation and	under Article 34.
in Regulation (EU) No 1227/2011, or whether	
any additional information or action is	A roll-back could be requested, or a reversion to the previous
required.	state, etc. before the strongest measure.
Where the IIP or RRM is no longer compliant	
with any of the requirements set out in this	
Regulation and in Regulation (EU) No	
1227/2011 as a result of a material change,	
the Agency may adopt a decision pursuant to	
Article 34.	

Article 33 Annual reporting by RRMs

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (2)	Paragraph (2)	Regarding Article 33 (2)(a), for the self-reporting RRMs, the
The annual report shall provide the following	The annual report shall provide the following	number of such report will be "0", as the RRM is responsible for
information for the reference year:	information for the reference year:	internally validating its own input content and the generated files,
(a) the number of invalid data records that	(a) the number of invalid data records that were	resolving any issues during the reporting process. For the third-
were not submitted to the Agency, including	not submitted to the Agency, including the identity	party RRMs, in the event of rejected input content, the RRM shall
the identity of the relevant market	of the relevant market participants;	request rectification and resubmission of the report by the client.
participants;	(b) the number of instances of invalid data records	Consequently, all transactions should be reported. The purpose
(b) the number of instances of invalid data	for which the RRM followed up with their	and benefit of this information remain unclear. Based on this data,
records for which the RRM followed up with		ACER could, if necessary, assess potential discrepancies between





their respective RRM clients in order to correct the data record in accordance with Article 27;

(c) in case of bilateral trades, the list of market participants who are not RRM clients, but who are the counterparties of RRM clients in the respective bilateral trades. respective RRM clients in order to correct the data record in accordance with Article 27;

(a) information on registered contingency reports submitted by RRMs;

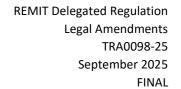
(be) in case of bilateral trades, the list of market participants who are not RRM clients, but who are the counterparties of RRM clients in the respective bilateral trades.

reportable and reported data for third-party RRMs only. The catalogue of information required in the annual report should remain fixed and closed.

Considering the proposal to delete the requirement for maintaining a register of invalid data in Article 27(2), ENTSOG and the gas TSOs have reservations about including information referenced in (a) and (b) in the annual report. Such tracking would entail a burdensome and ongoing comparison of invalid and corrected submissions, which is not justified by the limited operational or compliance value it provides.

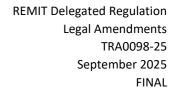
Article 38 Procedure for the orderly substitution

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Paragraph (1)	Paragraph (1)	
No later than two working days following the	No later than two working days following the	
notification of a withdrawal decision, the IIP	notification of a withdrawal decision, the IIP or	
or RRM whose authorisation has been	RRM whose authorisation has been withdrawn (the	
withdrawn (the 'withdrawing IIP or RRM')	'withdrawing IIP or RRM') shall inform its IIP clients	
shall inform its IIP clients or RRM clients, in	or RRM clients, in writing, of the arrangements and	
writing, of the arrangements and procedures	procedures to be followed for the transfer of	
to be followed for the transfer of relevant	relevant data and the redirection of reporting	
data and the redirection of reporting flows to	flows to an alternative IIP or RRM chosen by the IIP	
an alternative IIP or RRM chosen by the IIP	client or the RRM client . In the same	
client or the RRM client. In the same	communication, the withdrawing IIP or RRM shall	





communication, the withdrawing IIP or RRM shall request the relevant IIP clients or RRM clients to indicate their selected IIP or RRM for the purpose of ensuring orderly substitution (the 'selected IIP or RRM'). Paragraph (4)	request the relevant IIP clients or RRM clients to indicate their selected IIP or RRM for the purpose of ensuring orderly substitution (the 'selected IIP or RRM'). Paragraph (4)	
The withdrawing IIP or RRM shall obtain from the relevant IIP client or RRM client the information of the selected IIP or RRM in written form within one month from the notification mentioned in paragraph 1. If the relevant IIP client or RRM client fails to do so, the Agency shall notify the national regulatory authority of the Member State where the IIP client or RRM client is registered. The notified national regulatory authority shall assess the need for possible enforcement action.	The withdrawing IIP or RRM shall obtain from the relevant IIP client or RRM client the information of the selected IIP or RRM in written form within one three months from the notification mentioned in paragraph 1. If the relevant IIP client or RRM client fails to do so, the Agency shall notify the national regulatory authority of the Member State where the IIP client or RRM client is registered. The notified national regulatory authority shall assess the need for possible enforcement action.	
Paragraph (6) During the period for the orderly substitution established by the Agency, the withdrawing IIP or RRM shall transfer to the selected IIP or RRM the following:	Paragraph (6) During the period for the orderly substitution established by the Agency, the withdrawing IIP or RRM shall transfer to the selected IIP or RRM respective clients the following:	 ENTSOG and the gas TSOs propose an alternative approach and do not support the current proposal for orderly substitution of RRM → RRM and IIP → IIP, for the following reasons: Historically reported data would not be resubmitted by the new RRM to ACER.





- (a) the details of data records or inside information reports, as applicable, that have been reported or submitted to the Agency after the date of the adoption of the withdrawal decision;
- (b) for the withdrawing IIP, the details of inside information reports submitted to the Agency five years prior to such date, and for the withdrawing RRM, the details of data records reported to the Agency five years prior to the date of adoption of the withdrawal decision;
- (c) any other information relevant to the transfer of the withdrawing IIP's or RRM's services to the selected IIP or RRM.

- (a) the details of data records or inside information reports, as applicable, that have been reported or submitted to the Agency after the date of the adoption of the withdrawal decision;
- (b) for the withdrawing IIP, the details of inside information reports submitted to the Agency five two years prior to such date, and for the withdrawing RRM, the details of data records reported to the Agency five years prior to the date of adoption of the withdrawal decision; (c) any other information relevant to the transfer of the withdrawing IIP's or RRM's services to the
- Reporting of lifecycle events (LCEs) can only be triggered by the original data owners, i.e., the MPs or OMPs.
- Market participants' (MPs/OMPs) who are clients of the "withdrawn" RRM already have established channels for data exchange with that RRM.
- The ad-hoc creation of "one-to-many" RRM-to-RRM channels would be costly and time-consuming, without providing tangible benefits for the continuity of reporting.
- Several MPs (including TSOs) act as self-reporting RRMs to maintain data confidentiality and operational security. In the event of a "withdrawn" self-reporting RRM, requiring the MP to transfer historical trade data to a third-party RRM would impose unnecessary administrative and operational burdens without practical justification.

This alternative approach ensures continuity and integrity of reporting while avoiding disproportionate operational and technical burdens on market participants and RRMs. Instead of requiring a direct RRM-to-RRM or IIP-to-IIP transfer of historical data when an entity withdraws, the data remains with the original data owner — the MP or OMP — who already maintains those records.

Paragraph (8)

A withdrawing RRM which is reporting data records on its own behalf shall inform the Agency, in writing and within one month from the receipt of the withdrawal decision,

Paragraph (8)

selected IIP or RRM.

A withdrawing RRM which is reporting data records on its own behalf shall inform the Agency, in writing and within one month from the receipt of the withdrawal decision, about its selected RRM

There is no substantial benefit in transferring historical data to a third-party RRM, as the MP/OMP will continue market operations and is capable of retaining the historical data for the full duration of the statutory retention period.



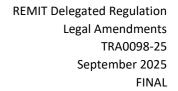
about its selected RRM for the purpose of ensuring orderly substitution. The notification shall include the information referred to in paragraph 2. Paragraphs 3, 5 and 6 of this Article shall apply mutatis mutandis.

for the purpose of ensuring orderly substitution. The notification shall include the information referred to in paragraph 2. Paragraphs 3, and 5 and 6 of this Article shall apply mutatis mutandis. The market participant, withdrawn from the RRM role, should store the data, subject to paragraph 6, for a period of 5 years.

A transfer of historical data for the self-reporting RRMs, in case of a withdrawal of their authorisation, to the third-party reporting RRMs will cause unnecessary dissemination of the internal information to the external parties. This will not bring any added value the purpose of reporting under the revised REMIT Regulation but might impose risks related to confidentiality.

Article 40 Entry into force and application

	Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
	[]	[]	The current proposal sets the entry into force of Articles 3 to 8
	Articles 3 to 8 and 10 to 39 shall apply from	Articles 3 to 8 and 10 to 39 shall apply from [OP:	and 10 to 39 at 12 months following publication, while
	[OP: please insert the date = 12 months after	please insert the date = 12 months 18 months after	implementation can only begin once ACER's guidance is
	the date of entry into force of this	the date of entry into force of this Regulation].	available—expected no earlier than 7 months after publication. To
	Regulation].		support a feasible, high-quality implementation and ensure
N			alignment with the principles of proportionality and regulatory
			simplification, we recommend extending the entry into force of
			these Articles to 18 months after publication.





ANNEX II Reportable details of inside information

Reference to Legal Text	ENTSOG suggestion	Rational/Argumentation
Data field (24) Curve type	Data filed (24) Curve type	The concept of "curve time," originally developed for electricity
Data field (27) Resolution	Data filed (27) Resolution	markets to reflect power fluctuations via predefined profiles, has
Data field (28) Position	Data filed (28) Position	been proposed for integration into gas UMM reporting. ENTSOG
	· · ·	and the gas TSOs do not support the introduction of curve time in
		the gas market for the following reasons:
		 Irrelevance to gas operations: Gas transmission systems typically operate with stable and predictable capacities,
		unlike electricity networks. Incorporating curve time
		would not reflect any meaningful operational reality for
		gas infrastructure.
		- Limited transparency benefit: Curve time would not
		enhance market transparency. The static nature of gas
		capacity means that such granularity does not provide
		additional insight into market conditions.
		 Operational and IT burden: Implementing curve time
		would require significant modifications to IT systems and
		reporting frameworks, creating disproportionate
		administrative and cost burdens for TSOs without
		delivering tangible benefits.



For these reasons, ENTSOG and the gas TSOs consider that the introduction of curve time into gas UMMs is neither operationally justified nor beneficial for market surveillance and strongly recommend retaining the current UMM format and avoiding any further complexity by additional UMM elements such as *Curve type*, *Resolution* and *Position*.