

Field No	Field Identifier	Description	Relevant for supply or transportation contracts	Electricity or Gas	Relevant for spot or derivatives contracts	Comments
Parties to the contract						
1.	Reporting time stamp	Date and time of reporting.	both	both	both	We think that there needs to be clarity over what is envisaged in relation to the date and time of reporting (Field 1) e.g. is this calendar day or gas day, and is this by reference to the time zone of the reporting party. In relation to the time zone, although (Field 26) refers to a Time Identifier, it is not immediately obvious how (Field 1) would be interpreted in the light of this. These points need to be clarified to ensure that there is consistency across the transaction reports.
2.	ID of market participant reporting the transaction	Unique code of the market participant that reports the transaction.	both	both	both	No. 2-5; duplication of codes Necessary publication of register with correspondances
3.	Type of code used for identifying market participant reporting the transaction	If a code different from the one allocated with the registration, indicate the type of code (EIC, BIC, GS1, LEI).	both	both	both	No. 2-5; duplication of codes Necessary publication of register with correspondances Conditional phrasing therefore not possible to make this field mandatory
4.	ID of the other market participant ⁷	A unique code to identify the counterparty of the transaction by a unique code (see above).	both	both	both	No. 2-5; duplication of codes Necessary publication of register with correspondances
5.	Type of code used for identifying the other market participant	If a code different from the one allocated with the registration, indicate the type of code (EIC, BIC, GS1, LEI).	both	both	both	No. 2-5; duplication of codes Necessary publication of register with correspondances Conditional phrasing therefore not possible to make this field mandatory
6.	Initiator Trader Username	The username as identified at the venue of the natural individual who initiated the order or the internal username in case of bilateral transactions.	both	both	both	market participants should keep a record of the internal individual trader executing each transaction but we do not see the benefit of reporting this information externally. Thus, we think "Initiator Trader Username" should not be reported.

7.	Aggressor Trader Username	The username as identified at the venue of the natural individual who aggressed the order or the internal username in case of bilateral transactions.	both	both	both	Definition of 'Aggressor' needed market participants should keep a record of the internal individual trader executing each transaction but we do not see the benefit of reporting this information externally. Thus, we think "Aggressor Trader Username" should not be reported.
8.	Venue or broker ID/OTC	In case the market participant used a market venue or broker to execute the transaction, this venue or broker shall be identified by an unique code.	both	both	both	Conditional phrasing therefore not possible to make this field mandatory
9.	ID of the reporting party	ID of the reporting party or a third reporting party.	both	both	both	Needed only in case a third party reports on behalf of the market participant
10.	Transaction Capture Time of the reporting party	Date and Time for which the reporting party received the transaction from the source.	both	both	both	Needed only in case a third party reports on behalf of the market participant
11.	Trading capacity	Identifies whether the transaction was executed on own account (on own behalf or behalf of a client) or for the account of, and on behalf of, a client.	both	both	both	Further clarification and definitions needed. Format needed e.g. "OA" (own account); "BC" (on behalf of a client)
12.	Beneficiary of the transaction	If the beneficiary market participant of the transaction is not counterparty to this transaction it has to be identified by an unique code.	both	both	both	It should not be required if No.11 is "OA" Further clarification and definitions required, suggestion to aCER to provide clear instructions and examples
13.	Buy/sell indicator	Identifies whether the transaction was a buy or sell for the reporting market participant.	both	both	both	OK
Contract type						
14.	Contract identification	The contract shall be identified by using an unequivocally contract identifier established in the ACER list of contracts or if the contract in question does not have a unique identifier, the report must include the name of the instrument or, in the case of a derivative contract, the characteristics of the contract.	both	both	both	Standard format needed Preference to use EFET's CPML format and definitions
15.	Product delivery profile	Identification of the delivery profile (baseload, peak, off-peak, block hours or other) which correspond to the delivery periods of a day.	both	both	both	Standard format needed Provided Item 17 and 18 are filled out, this item seems unnecessary EFET's CPML provides definitions aligned to the usage of items 17 and 18

16.	Delivery point or zone	Physical or virtual point where the delivery takes place.	both	both	both	Standard format needed Preference to use EFET's CPML format and definitions
17.	Delivery Start Date and Time	Start date and time of delivery	both	both	both	OK, although they should be in the 'details of the transaction' section
18.	Delivery End Date and Time	End date and time of delivery.	both	both	both	OK, although they should be in the 'details of the transaction' section
19.	Underlying identification	In case of derivatives, the underlying shall be identified by using an unequivocally identifier for this underlying or, if the underlying in question does not have a unique identification code, the report must include the name of the instrument and the characteristics of the contract.	both	both	Derivatives	Standard format needed Further clarification and definitions required, suggestion to ACER to provide clear instructions and examples Preference to use EFET's CPML format and definitions which are maintained in cooperation with ISDA
Details on the transaction						
20.	Transaction ID	Unique identifier for a transaction as assigned by the trading platform of execution, or by the two market participants in case of purely bilateral contracts.	both	both	both	In our opinion, unique identifiers for transactions should be assigned by the trading platform or in the absence of it a common trade ID is part of services for electronic matching that counterparties of a transaction may subscribe to as part of a matching process. For all transactions beyond those 2 processes, we think it is impractical for two market participants to agree on unique identifiers in the case of purely bilateral contracts as suggested in "Transaction ID"
21.	Linked Transaction ID	Where a transaction is linked to another transaction the referencing Transaction ID should be specified here. For example, the referencing Transaction of the Confirmation would be the ID of the underlying transaction as provided by the broker/exchange.	both	both	both	what if the transaction is mirrored to more than one transaction?

22.	Transaction Type	Indicator that signifies whether a transaction is an initiating order, an aggressing trade, an option or some other transaction type, e.g. Confirmation, Novation (Swap), Broker Give Up, Join the Trade, Gas Swing Trade, Capacity Trade, etc.	both	both	both	Standard format needed Further clarification and definitions required (e.g. Swaptions included, Fixed floating swaps, basis swaps etc), suggestion to ACER to provide clear instructions and examples
23.	Order Type	Type of the order executed.	both	both	both	Unclear. Orders are not usually stored. Only concluded trades Further clarification and definitions required, suggestion to ACER to provide clear instructions and examples
24.	Transaction time stamp	The day and time the transaction was executed or modified.	both	both	both	OK
25.	Order time stamp	The day and time the order was placed or modified.	both	both	both	Unclear. Orders are not usually stored. Only concluded trades
26.	Time Identifier	Indicating the time zone, expressed as coordinated time UTC.	both	both	both	OK
27.	Unit Price	Price indicating the value of the contract.	both	both	both	Clarification required on how represent terms of floating price physical transactions Clarification required on how to apply this item for stepped prices
28.	Price Notation	Indicates the currency in which the price is expressed.	both	both	both	OK
29.	Quantity	Where relevant the number of units of the wholesale energy product, or the number of contracts included in the transaction if applicable	both	both	both	Clarification required on how to apply this item for stepped quantities
30.	Quantity Unit	GJ, MWh referenced in Time unit quantity.	both	both	both	Preference to use EFET's CPML format and definitions
31.	Cancelation flag	An indication as to whether the transaction was cancelled, note this should include the withdrawal of orders from the market.	both	both	both	Not sure this information is available There is a lack of definition of 'Life Cycle Event's that are in scope of REMIT (e.g. Amended etc). Please also clarify if Novation and Termination events on trades are in scope for reporting
32.	Cleared / Uncleared	An indication whether the transaction was cleared or not.	both	both	both	Not sure this information is available There is no reference to trade payment terms nor events

33.	Option indicator	Identification whether it is a buy or a sell option (i.e. call or put).	both	both	Derivatives	Definition of 'Option' needed
34.	Swap indicator	Identification whether the transaction was a swap or not.	both	both	Derivatives	Definition of 'Swap' needed
35.	Derivative and its envisaged settlement type	E.g. settlement type as envisaged at the time of the execution ("Physical" or "financial").	both	both	Derivatives	<p>Not sure this information is available</p> <p>As defined in Section 2.1 of the document, derivatives are financial instruments as defined under Regulation 2004/39/EC (MiFID). EFET would consider it more appropriate, and certainly less prone to duplication and overlap, if such financial instruments were excluded from the scope of REMIT reporting obligations, to the extent that they are also reported under MiFID/EMIR.</p> <p>There is no reference to the trade settlement terms (strip of events etc)</p> <p>There is no reference to Commodity Reference Price or Specified Price nor to the generic pricing terms (calendar of fixings, factors or spreads) all key to describing a derivative trade.</p> <p>Additionally for options trades there is no mention of premium details, strike price, expiry date or rule or option type.</p>
36.	Originating Market	Identifies the originating market area concerned.	Transportation	both	both	<p>Standard format needed</p> <p>Preference to use EFET's CPML format and definitions</p>
37.	Destination Market	Identifies the market area where the delivery will take place.	Transportation	both	both	<p>Standard format needed</p> <p>Preference to use EFET's CPML format and definitions</p>
38.	Intrasystem	Where applicable the system used to transport between the seller's and buyer's system.	Transportation	both	both	<p>Further clarification and definitions required, suggestion to ACER to provide clear instructions and examples</p>
39.	Interconnection Point	Identification of the border or border point of a transportation contract.	Transportation	both	both	<p>Standard format needed</p> <p>Preference to use EFET's CPML format and definitions</p>

Field No	Field Identifier	Description	Relevant for supply or transportation contracts	Electricity or Gas	Relevant for spot or derivatives contracts	Mandatory fields	Comment
Parties to the contract							
1.	Reporting time stamp	Date and time of reporting.	Both	Both	Both	Mandatory	We think that there needs to be clarity over what is envisaged in relation to the date and time of reporting (Field 1) e.g. is this calendar day or gas day, and is this by reference to the time zone of the reporting party. In relation to the time zone, although (Field 26) refers to a Time Identifier, it is not immediately obvious how (Field 1) would be interpreted in the light of this. These points need to be clarified to ensure that there is consistency across the transaction reports.
2.	ID of market participant reporting the transaction	Unique code of the market participant that reports the transaction.	Both	Both	Both	Mandatory	No. 2-5; duplication of codes Necessary publication of register with correspondances
3.	Type of code used for identifying market participant reporting the transaction	If a code different from the one allocated with the registration, indicate the type of code (EIC, BIC, GS1, LEI).	Both	Both	Both	Mandatory	No. 2-5; duplication of codes Necessary publication of register with correspondances Conditional phrasing therefore not possible to make this field mandatory
4.	ID of the other market participant	A unique code to identify the counterparty of the transaction by a unique code (see above).	Both	Both	Both	Mandatory	No. 2-5; duplication of codes Necessary publication of register with correspondances
5.	Type of code used for identifying the other market participant	If a code different from the one allocated with the registration, indicate the type of code (EIC, BIC, GS1, LEI).	Both	Both	Both	Mandatory	No. 2-5; duplication of codes Necessary publication of register with correspondances Conditional phrasing therefore not possible to make this field mandatory

6.	ID of the reporting party	ID of the reporting party or a third reporting party	Both	Both	Both	Mandatory	Needed only in case a third party reports on behalf of the market participant
7.	Trading capacity	Identifies whether the transaction was executed on own account (on own behalf or behalf of a client) or for the account of, and on behalf of, a client.	Both	Both	Both	Mandatory	Further clarification and definitions needed. Format needed e.g. "OA" (own account); "BC" (on behalf of a client)
8.	Beneficiary of the transaction	If the beneficiary market participant of the transaction is not counterparty to this contract it has to be identified by a unique code.	Both	Both	Both	Mandatory	It should not be required if No.11 is "OA" Further clarification and definitions required, suggestion to aCER to provide clear instructions and examples
9.	Buy/sell indicator	Identifies whether the transaction was a buy or sell for the initiating market participant.	Both	Both	Both	Mandatory	We recommend that 'Buy /Sell' field 9 is optional as it is possible for non-standard financial contracts to be entered at zero upfront cost and for either party to move into the money. Therefore, although it may be possible to allocate a buyer / seller, this field will not always contain useful information for a non-standard contract.
Contract type							
10.	Contract identification	If the contract in question does not have a unique identification code, the report must include the name and the characteristics of the contract.	Both	Both	Both		Standard format needed Preference to use EFET's CPML format and definitions
11.	Product delivery profile	Identification of the delivery profile (baseload, peak, off-peak, block hours or other) which correspond to the delivery periods of a day.	Both	Both	Both	Mandatory	Standard format needed Provided Item 13 and 14 are filled out, this item seems unnecessary
12.	Delivery point or zone	Physical or virtual point where the delivery takes place.	Both	Both	Both	Mandatory	Standard format needed Preference to use EFET's CPML format and definitions Should not be mandatory in case on non-physical transactions

13.	Delivery Start Date and Time	Start date and time of delivery.	Both	Both	Both		OK, although they should be in the 'details of the transaction' section
14.	Delivery End Date and Time	End date and time of delivery.	Both	Both	Both		OK, although they should be in the 'details of the transaction' section
15.	Underlying identification	In case of derivatives, the underlying shall be identified by using an unequivocally identifier for this underlying or, if the underlying in question does not have a unique identification code, the report must include the name of the instrument and the characteristics of the contract.	Both	Both	Derivatives		Standard format needed Further clarification and definitions required, suggestion to ACER to provide clear instructions and examples Preference to use EFET's CPML format and definitions which are maintained in cooperation with ISDA
Details on the transaction							
16.	Transaction Type	Indicator that signifies whether a transaction is an initiating order, an aggressing trade, an option or some other transaction type, e.g. Confirmation, Novation (Swap), Broker Give Up, Join the Trade, Gas Swing Trade, Capacity Trade, etc.	Both	Both	Both		Standard format needed Further clarification and definitions required (e.g. Swaptions included, Fixed floating swaps, basis swaps etc), suggestion to ACER to provide clear instructions and examples There is no mention of 'Transaction ID'
17.	Transaction date and time	The day and time the transaction was executed or modified.	Both	Both	Both	Mandatory	OK
18.	Price elements	Price components which indicate the value of the contract. E.g. name of the index used to price the product.	Both	Both	Both	Mandatory	Clarification required on how represent terms of floating price physical transactions Clarification required on how to apply this item for stepped prices Given the specific aspects of non-standard contracts, more clarification is needed on how to populate this item
19.	Quantity	Where relevant the number of units of the wholesale energy product, or the number of contracts included in the transaction if applicable.	Both	Both	Both	Mandatory	Clarification required on how to apply this item for stepped quantities Given the specific aspects of non-standard contracts, more clarification is needed on how to populate this item

20.	Quantity Unit	GJ, MWh referenced in Time unit quantity.	Both	Both	Both	Mandatory	Preference to use EFET's CPML format and definitions
21.	Cleared / Uncleared	An indication whether the transaction was cleared or not.	Both	Both	Both		By definition this should not be cleared
22.	Option indicator	Identification whether it is a buy or a sell option (i.e. call or put).	Both	Both	Derivatives		Definition of 'Option' needed
23.	Swap indicator	Identification whether the transaction was a swap or not.	Both	Both	Derivatives		Definition of 'Swap' needed
24.	Derivative and its envisaged settlement type	E.g. settlement type as envisaged at the time of the execution ("Physical" or "financial").	Both	Both	Derivatives		<p>Not sure this information is available</p> <p>As defined in Section 2.1 of the document, derivatives are financial instruments as defined under Regulation 2004/39/EC (MiFID). EFET would consider it more appropriate, and certainly less prone to duplication and overlap, if such financial instruments were excluded from the scope of REMIT reporting obligations, to the extent that they are also reported under MiFID/EMIR.</p> <p>There is no reference to the trade settlement terms (strip of events etc)</p> <p>There is no reference to Commodity Reference Price or Specified Price nor to the generic pricing terms (calendar of fixings, factors or spreads) all key to describing a derivative trade.</p> <p>Additionally for options trades there is no mention of premium details, strike price, expiry date or rule or option type.</p>

25.	Originating Market	Identifies the originating market area concerned.	Transportation	Both	Both		<p>Not sure this information is available</p> <p>As defined in Section 2.1 of the document, derivatives are financial instruments as defined under Regulation 2004/39/EC (MiFID). EFET would consider it more appropriate, and certainly less prone to duplication and overlap, if such financial instruments were excluded from the scope of REMIT reporting obligations, to the extent that they are also reported under MiFID/EMIR.</p> <p>There is no reference to the trade settlement terms (strip of events etc)</p> <p>There is no reference to Commodity Reference Price or Specified Price nor to the generic pricing terms (calendar of fixings, factors or spreads) all key to describing a derivative trade.</p> <p>Additionally for options trades there is no mention of premium details, strike price, expiry date or rule or option type.</p>
26.	Destination Market	Identifies the market area where the delivery will take place.	Transportation	Both	Both		<p>Standard format needed</p> <p>Preference to use EFET's CPML format and definitions</p>
27.	Intrasystem	Where applicable the system used to transport between the seller's and buyer's system.	Transportation	Both	Both		<p>Standard format needed</p> <p>Preference to use EFET's CPML format and definitions</p>
28.	Interconnection Point	Identification of the interconnection point of a transportation contract.	Transportation	Both	Both		<p>Further clarification and definitions required, suggestion to ACER to provide clear instructions and examples</p>
Additional information for non-standardised contracts							

29.	Uploaded pdf file of the contract	Both	Both	Both	Mandatory		EFET questions the need to upload the pdf file of the contract as indicated in item 29, given the fact that substantially all the relevant information has already been covered under items 1 through 28. Moreover, as changes to initial prices and quantities give rise to the recording of a new transaction – as indicated in section 2.3 of the document, the need to repetitively upload the (initial) contract creates unnecessary burden upon operational processes and systems capacity.
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Standard contracts		NON-Standard contracts			
No	Field Identifier	NO	Field Identifier		
Parties to the contract		Parties to the contract		correspondance	
1.	Reporting time stamp	1.	Reporting time stamp	=	1.
2.	ID of market participant reporting the transaction	2.	ID of market participant reporting the transaction	=	2.
3.	Type of code used for identifying market participant reporting the transaction	3.	Type of code used for identifying market participant reporting the transaction	=	3.
4.	ID of the other market participant7	4.	ID of the other market participant	=	4.
5.	Type of code used for identifying the other market participant	5.	Type of code used for identifying the other market participant	=	5.
6.	Initiator Trader Username				6.
7.	Aggressor Trader Username				7.
8.	Venue or broker ID/OTC				8.
9.	ID of the reporting party	6.	ID of the reporting party	=	9.
10.	Transaction Capture Time of the reporting party				10.
11.	Trading capacity	7.	Trading capacity	=	11.
12.	Beneficiary of the transaction	8.	Beneficiary of the transaction	=	12.
13.	Buy/sell indicator	9.	Buy/sell indicator	=	13.
Contract type		Contract type			Contract type
14.	Contract identification	10.	Contract identification	=	14.
15.	Product delivery profile	11.	Product delivery profile	=	15.
16.	Delivery point or zone	12.	Delivery point or zone	=	16.
17.	Delivery Start Date and Time	13.	Delivery Start Date and Time	=	17.
18.	Delivery End Date and Time	14.	Delivery End Date and Time	=	18.
19.	Underlying identification	15.	Underlying identification	=	19.
Details on the transaction		Details on the transaction			Details on the transaction
20.	Transaction ID				20.
21.	Linked Transaction ID				21.
22.	Transaction Type	16.	Transaction Type	=	22.
23.	Order Type				23.
24.	Transaction time stamp	17.	Transaction date and time	different	24.
25.	Order time stamp				25.
26.	Time Identifier	17.	Transaction date and time	different	26.
27.	Unit Price				27.
28.	Price Notation	18.	Price elements	different	28.
29.	Quantity	19.	Quantity	=	29.
30.	Quantity Unit	20.	Quantity Unit	=	30.
31.	Cancelation flag			?	31.
32.	Cleared / Uncleared	21.	Cleared / Uncleared	=	32.
33.	Option indicator	22.	Option indicator	=	33.
34.	Swap indicator	23.	Swap indicator	=	34.
35.	Derivative and its envisaged settlement type	24.	Derivative and its envisaged settlement type	=	35.
36.	Originating Market	25.	Originating Market	=	36.
37.	Destination Market	26.	Destination Market	=	37.
38.	Intrasystem	27.	Intrasystem	=	38.
39.	Interconnection Point	28.	Interconnection Point	=	39.
		Additional information for non-standardised contracts			No
		29.	Uploaded pdf file of the contract	+	No
					Additional
					29.