

# REMIT Transaction Reporting User Manual (TRUM)

**Annex I – Guidance on reporting  
lifecycle events**

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# 1. Introduction and scope

## 1.1. Purpose of the document

Article 2(15) of the recast Commission Implementing Regulation (EU) 2026/256 ('REMIT Implementing Regulation') specifies the definition of 'lifecycle event' in relation to transaction reportable under Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency<sup>1</sup> ('REMIT').

In order to ensure the completeness, accuracy and consistency of the reported REMIT data set, it is essential for reporting parties, including market participants, organised marketplaces ('OMP') and registered reporting mechanisms ('RRM') to have a common understanding on how the lifecycle event shall be reported.

Annex I to the Transaction Reporting User Manual ('TRUM') (predecessor to the former Annex VII to the TRUM) aims to further complement the information provided in the TRUM on reporting lifecycle events and, thus these two guidance documents shall be consulted together. Practical examples of frequently reported lifecycle events are provided in Annex II to TRUM.

Moreover, additional considerations on the definition of lifecycle events can be found in ACER's Guideline on REMIT transaction reporting.

The present release of this document provides guidance on the reporting of lifecycle events of transactions reported in Table 1 and Table 2 of the Annex of the REMIT Implementing Regulation as regards to contracts for the supply of electricity and natural gas set out in Article 3(a)(i) of the REMIT Implementing Regulation. In addition, this annex shall be also consulted when reporting transactions relating to the supply or storage of electricity or the supply of natural gas to a single consumption unit with a technical capability to consume 600 GWh/year or more, unless concluded on an OMP, reportable on a periodic basis pursuant to Article 4(2) of the REMIT Implementing Regulation. While the obligation for these transactions do not constitute a continuous but periodic reporting, Table 1 and Table 2 shall be used when reporting under REMIT given that these transactions refer to contracts for supply. This implies that the related lifecycle reporting requirements shall follow the guidance as specified in this annex. On the other hand, regarding the reporting of LNG market and trade data, while Table 1 shall be adopted for the reporting of this data set, the related lifecycle reporting requirements shall comply with those specified in Annex III to the TRUM given the different timelines and type of information applicable for the LNG market data and the concluded LNG trade.

## 1.2. Target audience

This document serves as a reporting guidance for market participants, OMPs and RRM reporting transaction data by using Table 1 and Table 2. The above-mentioned reporting parties shall consult this annex together with its parent document, i.e. the TRUM, thoroughly and with great attention to details, in order to ensure correct interpretation and implementation of the guidance

## 1.3. Business continuity

ACER updates and publishes this guidance document whenever necessary, after consulting with the relevant stakeholder groups, in order to ensure the accuracy and completeness of reporting requirements to extent possible.

## 1.4. Contacting ACER

ACER recommends reporting parties who have questions related to the requirements described in this guidance or on REMIT transaction reporting in general to submit their questions via ACER's [REMIT Query Form](#) available on the [REMIT Documents](#) section of the ACER website.

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<sup>1</sup> Revised via the amending Regulation (EU) 2024/1106

## 2. General purpose and logic for lifecycle reporting

Each REMIT reportable transaction shall be initiated by having a valid and active record (i.e. successfully reported record) in the ARIS database with the Data Field (88) in Table 1 or Data Field (51) in Table 2 on Action type with value 'N' for 'New'. This always represents the first reported event in the sequence of the particular transaction event.

If any reportable change in the initially reported transaction occurs as defined in Article 2(15) of the REMIT Implementing Regulation, it represents a subsequent lifecycle event of that transaction to be reported by flagging the applicable event as a modification, cancellation or invalidation in the data field on Action type. However, lifecycle events are not meant primarily for correcting information wrongly reported in the previous transaction records (within this document such records are referred to as 'corresponding records'), nevertheless such erroneous records shall always be corrected by using value 'E' for 'Error' as an action type.

*The purpose of the lifecycle event reporting is to complement the previously reported record with additional or updated information.*

The Delegated Regulation Guidance contains a description of the data validation rules used by ACER in the ARIS data base to ensure the validation of the reported transactions, including the correct sequencing of lifecycle events. In the following sections, the fundamental rules for the correct sequencing of the reporting of lifecycle events are explained.

For **transactions reportable in Table 1** (i.e. transactions placed/concluded on an OMP, as well as bilateral transactions with fixed price and quantity, including Executions) the following data fields constitute the key which uniquely identifies the record reported in the ARIS data base:

- Data Field (1) ID of the market participant or counterparty
- Data Field (13) Buy/sell indicator
- Data Field (15) Order ID (applicable only for order records)
- Data Field (23) Contract ID
- Data Field (33) Organised marketplace ID/OTC
- Data Field (38) Unique transaction ID (applicable only for trade records)
- Data Field (40) Linked order ID
- Data Field (88) Action type

For **transactions reportable in Table 2** (i.e. bilateral non-standard contracts with defined but not fixed price/quantity) the following data fields constitute the key which uniquely identifies the record reported:

- Data Field (1) ID of the market participant being a counterparty to the contract
- Data Field (3) ID of other market participant being the other counterparty to the contract
- Data Field (9) Buy/sell indicator
- Data Field (10) Contract ID
- Data Field (51) Action type

In general, to be able to report the lifecycle event of a reported transaction, the information provided in the above-mentioned key data fields, except for the one on Action type, shall exactly match with that of the corresponding records. This means that the information provided in these data fields for the first record reported with Action type N is not allowed to be updated (i.e. modified) with new or different values.

## 3. Action types

The possible action types for lifecycle event reporting in Data Field (88) in Table 1 and Data Field (51) in Table 2 are 'N' (New), 'M' (Modified), 'C' (Cancelled) or 'E' (Error). In the following subsections a description of the application of different action types is provided.

### 3.1. Action type N

Action type N (New) shall be used to report a **new transaction**. A corresponding record with any other action type can be accepted in ARIS only if a record with Action type N has been successfully reported previously (the N record is active and valid in the ARIS data base).

*Action type N always indicates the first event in any transaction's lifecycle.*

### 3.2. Action type M

Action type M (Modify) shall be used in case the reporting parties report a **modification** of a previously reported transaction in order to reflect the occurrence of a new business decision or business event affecting the transaction. Action type M should NOT be used for correcting wrongly submitted information. For example, in case of orders Action type M shall be used to modify an order record previously reported that was partially matched. In such a case the modified order records would indicate a change in the status of the order and change in the quantity of the order that is left for trading.

*Action type M indicates that the corresponding transaction record has been modified due to a business decision or as a result of a business event.*

As another example, the modification of the delivery profile an outstanding non-standard contract that was previously reported in Table 2 is considered as a change stemming from a business decision that was taken after the conclusion of the contract, hence to be reported with Action type M while maintaining the same Contract ID as indicated in the first record.

### 3.3. Action type C

Action type C (Cancel) shall be used in case the reporting parties intentionally report a business event that represents the **early termination** of an outstanding trade, bilateral contract or the cancellation of an order. In general, Action type C represents the end of the transaction's lifecycle. Action type C shall NOT be used for deleting wrongly submitted information.

For example, Action type C shall be used when an order is permanently withdrawn from the order book, or a bilateral contract is early terminated due to the decision of the counterparties to cancel the contract or due to novation.

*Action type C indicates the last event in the transaction sequence as triggered by a business decision or as a result of a business event.*

### 3.4. Action type E

Action type E (Error) shall be used to **invalidate an erroneously reported transaction**.

*Action type E shall be used if the reporting party needs to indicate that the previously submitted record was erroneously reported, i.e. the information provided in the reported record was incorrect.*

Any correction of an already reported record by using Action type E will result in the logical deletion (i.e. invalidation) of the corresponding record, which was previously successfully reported, in ARIS. However, its invalidation does not remove or delete the corresponding record from ARIS.

It is important to note that reporting an event with Action type E cannot be the result of a business decision, e.g.

the result of a change of the economic values of the order or the trade, such as its price or quantity.

While Action type E is intended to flag the need to invalidate the relevant record, it cannot be used to correct in the record itself a wrongly reported information. This means that once Action type E was reported, further actions need to be taken by the reporting party to report to ACER the correct information, as described in the following sections, unless the record should not have been reported to ACER at all.

### 3.5. Summary table

Reporting of Action types entails prerequisites and rules which are important to follow in order to correctly report the sequence of records representing the transaction lifecycle, as presented in the summary below:

ACTION TYPE	PRE-REQUISITE	MEANING	TRANSACTION TIME / UNIQUE IDENTIFIER / XML CONTENT
N (New)	A new reportable transaction occurring	Record reported with Action type N is always the first, uniquely identified record of any transaction and it is a pre-requisite for reporting any other subsequent lifecycle event of the given transaction with Action type M, C or E.  If the uniquely identified transaction with Action type N is the only successfully reported record, it represents the current valid status of the outstanding transaction.	<p><b>Transaction time</b></p> <p>Table 1: Transaction timestamp in Data Field (37) shall reflect the <b>exact date and time of the occurrence of the transaction</b>, e.g. exact date and time of the order activation.</p> <p>Table 2: Contract date in Data Field (11) shall reflect the exact date when the contract was agreed between the counterparties.</p> <p><b>Unique transaction identifiers</b></p> <p>The unique identifier shall be unique as defined in TRUM and used throughout all reported lifecycle events of the transaction. The following data fields contain the unique identifier for an order, trade or bilateral contract:</p> <p>Table 1:</p> <ul style="list-style-type: none"> <li>Data Field (15) Order ID</li> <li>Data Field (23) Contract ID</li> <li>Data Field (38) Unique transaction ID</li> </ul> <p>Table 2:</p> <p>Data Field (10) Contract ID</p>
M (Modify)	1. A REMIT reportable business event	The record with Action type M indicates the modification/update of the	<b>Transaction time</b>

	<p>occurring related to the transaction</p> <p>2. Existence of a valid and active corresponding record reported previously with either Action type N, or Action type N and M</p>	<p>information provided in the corresponding record in the relevant data fields in order to reflect a business decision.</p> <p>If the uniquely identified transaction with Action type M is the last successfully reported lifecycle event, it represents the current valid state of the outstanding transaction.</p> <p>The record with either Action type N or M can be further modified with a corresponding record with Action type M.</p>	<p>Table 1: Transaction timestamp in Data Field (37) shall reflect the exact date and time of the business decision/event causing a need for the modification of the record, e.g. exact date and time of the matching order.</p> <p>Table 2: Contract date in Data Field (11) shall reflect the exact date when the modification of the contract was agreed between the counterparties.</p> <p>In general, the transaction time of the modified transaction is expected to be the same as or greater than the transaction time reported in the corresponding valid record reported previous with Action type N or M.</p> <p><a href="#">Providing additional information to the record (not new business event)</a></p> <p>It is crucial to distinguish how to report the transaction time in case the reporting party needs to provide <b>additional information</b> (e.g. for agency transactions the Beneficiary ID, when the identification of the final beneficiary was not known previously) that is not considered a new business event. Such a modification is expected to be reported with Action type M, but <b>the transaction time shall remain the same as provided in the last corresponding valid record</b> reported previously. This means that the transaction time in such cases shall not reflect the time when the missing information became available but the transaction time of the previous valid record, since such information is considered static (assumingly agreed already at the time of the placing or conclusion of the transaction).</p> <p><a href="#">Unique transaction identifiers</a></p> <p>The unique identifier shall be unique as defined in the TRUM and used throughout the lifecycle of the transaction.</p> <p>A unique identifier of a transaction cannot be modified, except for the case when there is a temporary UTI used in Table 1 (for more details, see Chapter 5.3.3).</p>
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<p><b>C (Cancel)</b></p>	<p>1. Business event occurring that represents the early termination / cancellation of the transaction</p> <p>2. Existence of a valid and active corresponding record reported previously with either Action type N, or Action type N and M</p>	<p>The record with Action type C indicates that the transaction has been cancelled (for orders withdrawn or suspended) due to a business event.</p> <p>If a uniquely identified transaction with Action type C is the last successfully reported lifecycle event, it represents the valid state of the transaction indicating that the relevant transaction has completed its lifecycle.</p> <p>Record with Action type C cannot be further modified with Action type M or cancelled with Action type C by another record.</p>	<p><b>Transaction time</b></p> <p>Table 1: The transaction timestamp in Data Field (37) shall reflect the exact date and time of the cancellation, e.g. the exact date and time of the order's permanent withdrawal or its expiration.</p> <p>Table 2: Contract date in Data Field (11) shall reflect the exact date the contract cancellation was agreed by the counterparties.</p> <p>The transaction time / contract date of the early terminated transaction or contract should be the same or greater than the transaction time reported in the corresponding valid record reported previous with Action type N or M.</p> <p><b>Unique transaction identifiers</b></p> <p>As the transaction has completed its lifecycle, the unique identifier (either the Order ID or the UTI in Table 1 or the Contract ID in Table 2) shall not be re-used for identifying another transaction.</p>
<p><b>E (Error)</b></p>	<p>1. Wrongly submitted record detected that was reported previously to ARIS</p> <p>2. Existence of a valid and active corresponding record reported previously with either Action type N, or Action type N and M</p>	<p>The record with Action type E indicates the invalidation of the corresponding record provided both records having the same transaction timestamp.</p> <p>If the corresponding record with the earlier transaction time exists and was invalidated, it represents the current valid state of the transaction.</p> <p><b>Scenarios for sequencing:</b></p> <p><i>Case 1: A record with Action type N followed by a record with Action type M with the <u>same</u> transaction time as the N record</i></p> <p>If the subsequent record with Action type E has the same transaction time than the N and M records, both N and M records will be invalidated by the record with Action type E.</p>	<p><b>Transaction time</b></p> <p>The record with Action type E needs to have the same Transaction time value (Table 1: Data Field (37) Transaction timestamp; Table 2: Data Field (11) Contract date) as the corresponding record that is to be invalidated.</p> <p><b>Unique transaction identifiers</b></p> <p>After the invalidation of a record with Action type E, the corrected record that represents the same transaction by using Action type N can re-use the unique identifier of the invalidated record.</p> <p><b>XML content</b></p> <p>If to be reported, the corrected record with Action type N (re-using the unique identifier of the transaction and indicating the transaction time of the event) should be submitted in the <u>same XML file</u> as the record used for invalidation and reported with Action type E.</p>

	<p><i>Case 2: A record with Action type N followed by a record (or records) with Action type M with <u>different transaction time</u></i></p> <p>If the subsequent record with Action type E has different transaction time than the N record but same timestamp as the M records, only the record with Action type M will be invalidated. In this case the record with Action type N remains valid and further actions type can follow (see instructions for N above).</p> <p>However, if both records – one with Action type N and one with Action type M are to be invalidated, two records with Action type E with two transaction times as provided in N and M records have to be sent.</p> <p>Invalidating only the N record, while not invalidating the M record is not allowed and must be avoided.</p> <p><i>Case 3: An order record with status 'ACT' and the related, subsequently modified order record with status 'PMA' have the same transaction timestamp, but only the order record with status 'PMA' needs to be invalidated</i></p> <p>At the moment it is not possible to invalidate only one order record (e.g. with order status PMA) if both order records have the same timestamp (and the same remaining fields of the key, e.g. Order ID). In case a new record with Action type E is reported with the same timestamp as the other two orders', both order records will be invalidated by the record sent with Action type E. This means that the order record with status 'ACT'</p>	<p>The same principle applies when sending an invalidating record with Action type E and a subsequent corrected record with Action type M or Action type C (i.e. reporting within the same XML file).</p>
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		needs to be resubmitted (and if to be corrected, the order record with status 'PMA' as well).	
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## 4. Data fields with static information in Table 1 and Table 2

This chapter aims to describe the lifecycle event requirements for those data fields that are available both in Table 1 and in Table 2 and where the same reporting requirements shall apply with regards to lifecycle reporting, irrespective which Table is being used. The list of data fields provided below is non-exhaustive, as it aims to focus on those fields that bring essential information on the fundamental terms of the transaction.

### 4.1. ID of the market participant

Data Field (1) in both Table 1 and Table 2 shall be populated with the identification of the market participant responsible for the transaction. This field in both Tables is considered as part of the key for the unique identification of the transaction. Hence, the modification of the information reported in this field with Action type M is not allowed within the transaction's lifecycle.

While the ID of the other market participant reported in Data Field (6) and Data Field (3) is part of the unique key, the change in the identification of the counterparty is considered a novation, hence, the modification of the transaction with a different ID identifying a counterparty is not allowed.

#### 4.1.1. Novation

The change of the counterparty as a legal entity (e.g. due to the company merges or selling company that was previously part of the group, i.e. intergroup contracts change the nature and become reportable or change of the ACER code of counterparty etc.) that entered into a trade/contract constitutes a case of novation. In this case all outstanding trades and contracts have to be novated with the ID of the new legal entity in order to notify ACER about the change of the counterparty and report all outstanding and potential new events considered a lifecycle.

Novation can also refer to cases when the legal entity

- has been terminated as a REMIT market participant in CEREMP, or
- has re-registered with another NRA, or
- has been merged with another legal entity that became the owner of the contract.

In order to report a novation, the early termination of the transaction with Action type C and with the old Unique transaction identifier in Table 1 or Contract ID in Table 2 has to be reported. In addition, the transaction timestamp in Table 1 or contract date in Table 2 shall indicate the day of the communication of the change of the legal entity, while the Termination date in Data Field (57) shall refer to the effective date of the change.

The novated trade/contract with a new UTI in Table 1 or new Contract ID in Table 2 should be reported with Action type N by referring to the new legal entity primarily in line with the reporting deadline or as soon as the new ACER code is communicated to the counterparty.

The transaction timestamp or contracts date shall indicate, respectively in Table 1 and Table 2, the new timestamp or contract date when the transaction or the bilateral contract was agreed. This process applies to both sides of the trade.

If the novation needs to be reported via the so called 'parallel reporting channel' (e.g. due to the termination of a market participant in CEREMP prior to the novation reporting) reporting parties need to consult the Delegated Regulation Guidance.

#### Example

Market participant (MP) A reports a transaction with MP B as a counterparty identified by code 'ACERNONMP.EU' in MP A's report. A month later, when MP B completes its registration with the competent NRA and informs MP A of its ACER code (or any other reportable code).

As previously reported transactions by MP A identify MP B with the generic ACER code (ACERNONMP.EU) as its counterparty, as soon as MP A is informed about the new identification code of MP B, it shall report the novation of the outstanding transaction.

On the other hand, in virtue of the existing validation rules, MP B will be able to successfully report transactions only once it has been registered with the competent NRA and received the ACER code. Once the registration with the NRA is completed, MP B will have to report all its transactions that fall under the scope of REMIT, irrespective whether they refer to concluded or outstanding delivery.

## 4.2. Beneficiary ID

In case a transaction has been concluded on behalf of a final beneficiary being different than the market participant in Data Field (1), the final beneficiary must be identified in Data Field (10) in Table 1 or in Data Field (6) in Table 2. ACER considers the following reporting scenarios in the context of lifecycle reporting for the final beneficiary.

### 4.2.1. Beneficiary ID not reported in the first record with Action type N

The Beneficiary ID is expected to be reported in the transaction record with Action type N, if Data Field (12) in Table 1 or Data Field (8) in Table 2 on Trading capacity of the market participant or counterparty is populated with 'A' for Agent.

ACER understands that there are cases when the organised marketplace might not be in the position to report the Beneficiary ID at the moment when reporting the transaction with Action type N. Similarly, in case of the delegated reporting of a bilateral transaction, the counterparty in charge of the reporting might not know the beneficiary ID when reporting the transaction. In these specific cases, the transaction has to be updated with the ID of the final beneficiary once it is known, by using Action type M. It is important to note that the transaction timestamp of the M record which provides the missing beneficiary ID shall have the same transaction timestamp as the timestamp of the last successfully reported record in the lifecycle sequence<sup>2</sup>. This relies on the requirement that providing a missing information (that should have been reported already in the first record with Action type N) cannot be considered as a new business event, hence, reported with a new transaction timestamp.

### 4.2.2. Updating the beneficiary ID

In case the beneficiary ID was reported in the transaction record (in Table 1 or Table 2), but it needs to be modified (for example due to the merger of two companies which results in the change of the ACER code of the market participant that appears as final beneficiary in transaction reports), the beneficiary ID can be modified by using Action type M, irrespective of using Table 1 or Table 2. This implies that no novation is expected to be reported when there is a change in beneficiary ID. In this case the

**Commented [A1]: QUESTION:** Stakeholders are invited to provide feedback on the revised guidance when there is a change in the beneficiary ID reported previously. The revised guidance would allow the application of Action type M to report a new beneficiary ID, while the currently published lifecycle guidance (Annex VII to the TRUM) requires a novation.

<sup>2</sup> The timestamp of the N record can only be used if that is the only valid and active record in the transaction's lifecycle, otherwise the record will be rejected.

transaction timestamp should indicate the time when the new ID of beneficiary becomes available (since such modification is triggered by a new business event).

In addition, there is no expectation to apply the above-mentioned requirements for lifecycle reporting for the related matched orders, in case of trades concluded on an OMP resulting from matched orders. However, unexecuted orders shall be updated with the information on the beneficiary ID by reporting Action type M.

**Commented [A2]:** **NOTE:** The guidance provided is based on FAQ 2.1.9.

### 4.3. Buy/sell indicator

Data Field (13) in Table 1 and Data Field (9) in Table 2 on Buy/sell indicator shall flag whether the reported transaction record constitutes the buy or the sell side of a transaction. The buy/sell indicator reflects a fundamental feature of a transaction and contributes to the key that uniquely identifies the record in ARIS. This implies that if the buy/sell indicator is changed, it can be only reported as a cancellation of the transaction with Action type C followed by reporting a new transaction with Action type N.

ACER understands that the IT system of some organised marketplaces may allow the change of the buy/sell indicator of an order. Nevertheless, this is considered a feature of the technical system rather than the market rules of the organised marketplace. Therefore, such a change cannot be regarded as a modification of the existing order record but rather as a new order.

### 4.4. Delivery point or zone

**Commented [A3]:** **NOTE:** The guidance provided is based on FAQ 2.4.12.

The modification of the bidding zone configuration (i.e. either the splitting or merging of bidding zones) represents an event independent from the business decisions carried out by individual market participants dealing with their trading activity on wholesale energy markets. Hence, as a general consideration, ACER does not expect to receive the reporting of lifecycle events on outstanding trades and contracts if referred to the modification of Data Field (78) Delivery point or zone in Table 1 or Data Field (41) Delivery point or zone in Table 2 solely.

From the REMIT data reporting point of view, it is expected that:

- a) All new REMIT-reportable transactions (relating to either standard and non-standard contracts) concluded on or after the date when the new bidding zone configuration enters into force have to report the delivery point or zone with the EIC of the new bidding zone(s) in Data Field (78) in Table 1 and Data Field (41) in Table 2.
- b) The outstanding REMIT reportable transactions, including executions, concluded before the date when the new bidding zone configuration enters into force, do not require the reporting of lifecycle events, as triggered by solely the introduction of the new EICs.
- c) Executions of outstanding Table 2 non-standard contracts with delivery start date on the date when the new bidding zone configuration enters into force and onwards shall indicate Data Field (78) Delivery point of zone populated with the new EICs.
- d) For executions of new Table 2 non-standard contracts concluded after the date when the new bidding zone configuration enters into force, the requirements specified in paragraph a) shall apply.

## 5. Lifecycle events of transactions reported in Table 1

In Table 1 shall be used when reporting the following transactions under REMIT:

- Orders placed on an OMP
- Trades concluded on an OMP
- Bilateral transactions with fixed price and quantity

This chapter aims to describe the lifecycle reporting requirements of transactions placed/concluded on an OMP or bilaterally.

### 5.1. Static information to be reported with Action type N

#### 5.1.1. Data Field (4) ID of the trader

The change of the ID of the trader reported in Data Field (4) does not represent a lifecycle event.

In a similar fashion, the event when a trader leaves the market participant does not constitute a lifecycle event in itself either, hence the outstanding transactions do not need to be updated with a new trader ID, unless other parameters of the transaction change that is considered a REMIT reportable event.

#### 5.1.2. Data Field (5) Algorithm ID

In case the transaction to be reported involves an algorithm, Data Field (5) shall be populated with the ID of algorithm used for placing or concluding the transaction. The algorithm ID is considered a static information, hence, not expected to change during the lifecycle of the transaction.

In addition, the ID of the algorithm shall always be provided in the first order/trade record reported with Action type N. The reporting of the algorithm ID as a lifecycle event to the reported transaction in Data Field (5) is not acceptable and considered as being non-compliant with the data quality requirements on accuracy and completeness.

#### 5.1.3. Data Field (15) Order ID

The ID of the order, as assigned by the respective OMP, shall be unique for the contract offered for trading and for the OMP at which it was placed. In addition, the Order ID shall remain unique throughout the reporting of all lifecycle events of the order. Once the order lifecycle has been reported with Action type C representing the permanent withdrawal or suspension of the order (i.e. the end of the order's lifecycle), the same Order ID can no longer be adopted for any further lifecycle event of that order. Additionally, the same Order ID cannot be re-used for another order placed on the same OMP for the same Contract ID.

It is also required that trades resulting from matched orders refer to the corresponding Order ID by populating Data Field (40) Linked order ID. This is important also for the appropriate understanding of the trading cycle and lifecycle events.

In case of orders to trade, whenever Action type C is used to indicate the end of the order's lifecycle, it no further lifecycle event (e.g. with Action type M) relating to the same Order ID that occurred after the cancellation is allowed to be reported.

#### 5.1.4. Data field (23) Contract ID

Orders and trades always refer to a tradable instrument, i.e. a specific contract identified via a unique Contract ID. As indicated in the TRUM under Data Field (23) Contract ID, the field identifies the unique contract ID provided by the organised marketplace at which the contract is traded and constitutes the key that uniquely identifies the transaction.

**Commented [A4]: NOTE:** The guidance provided is based on FAQ 2.4.4.

**Commented [A5]: QUESTION:** Stakeholders are invited to provide use cases in the context of algorithmic trading to be considered for the lifecycle reporting requirements of the transaction (e.g. possibility to switch from one algo to the other during the order's lifecycle, or actions in case of malfunctioning of the algo, etc...).

In case an order is initially reported by referring to a 'generic contract ID' and after the matching process the contract is replaced with a specific one entailing a different Contract ID, it is necessary to report this change. Reporting of such a lifecycle event shall be done by cancelling the order linked to a generic contract with Action type C and by reporting an order with a new Order ID referring to the new contract (Contract ID) with Action type N. The same new order ID should also be used in the corresponding trade in Data Field (40) Linked Order ID.

Data Field (23) shall always be populated with the default value 'BILCONTRACT' in case of bilateral transactions and in any of their related lifecycle events.

#### 5.1.5. Data Field (27) Fixing index or reference price

If a price of a contract is fixed by an index or reference price, the name of the fixing index shall be reported in Data Field (26). If the index value is known at the time of the transaction, it shall be reported in Data Field (48) Index value. However, if the index value is not known at the time of placing or conclusion of the transaction, there is no expectation to report a modification to the transaction as a lifecycle event with the published price of the index once it is known.

## 5.2. Lifecycle events related to orders

The following section specifies the lifecycle reporting requirements for the data fields relating to orders to trade.

### 5.2.1. Order modification in the electronic format

In the REMITTable1 schema the OrderList section includes a choice structure between *fullRecordData* and *modRecordData*. When reporting a lifecycle event of an order, a choice between the application of the two structures shall be made by taking into account the following requirements:

- *fullRecordData*: This sub-section, which includes the mandatory Action type field, is to be applied to report new records with Action type N, M C and E in general with the full set of information relevant for the given order record.
- *modRecordData*: this sub-section shall be used when a previously submitted order record is to be modified, provided that only the price and/or quantity information is to be amended. This implies that the allowed values in the Action type field implemented in this sub-section are restricted to Action type M and C and only the following data fields are allowed to be modified:
  - Data Field (45) Price,
  - Data Field (53) Quantity/Volume
  - Data Field (54) Total notional contract quantity

The above description means that if there is a change in the status of the order reported in Data Field (18), such as in case of 'PMA' or 'REF', the *modRecordData* section cannot be used, *fullRecordData* shall be adopted instead.

### 5.2.2. Data Field (18) Order status

The complexity of an order lifecycle will depend on the different characteristics of the order indicated in Data Field (16) Order type, Data Field (17) Order condition, Data Field (18) Order status and Data Field (22) Order duration, as well as the business decisions regarding price and quantity changes and market rules related to the order.

Data Field (16) Order status is a mandatory field for all orders and their lifecycle events.

As stated in the TRUM, ACER expects that a single order status is reported within the record. If **two simultaneous events happen while both being reflected in the order status**, it is expected that two records, one per each status, need to be reported indicating the same transaction timestamps for both (representing the time of the event).

**Commented [A6]: QUESTION:** Stakeholders are invited to provide feedback on whether the application of a generic contract ID should be still considered as current industry practice hence keep the current guidance in Annex I.

**Commented [A7]: NOTE:** The guidance provided is based on FAQ 2.1.20.

**Commented [A8]: QUESTION:** Stakeholders are invited to consult the draft REMITTable1 schema shared for consultation together with this document, which includes the proposed structure for *fullRecordData* and *modRecordData*. Stakeholders are invited to provide feedback on the proposed technical solution and use cases to be clarified in this guidance in addition.

An exception to the guidance is the case when the multiple order statuses are the result of one business decision, thus, one order status is sufficient to explain the changes affecting the order. For example, for an order where **partial matching and automatic refilling from the hidden quantity** occur simultaneously (typical for iceberg orders), **only one order record** is expected to be sent to ARIS with order status 'PMA' for 'Partial matched'. In this case the indication of order status 'REF' for 'Refilled' is not requested.

**Commented [A9]: QUESTION:** Stakeholders are invited to suggest additional reporting examples in case of reporting iceberg orders.

### 5.2.3. Data Field (37) Transaction timestamp

#### Action type N

The timestamp of an order record with Action type N shall reflect the time when the order was activated by the system or by the market participant and made visible to the market.

In the case of auction markets where orders are not made publicly visible, only the final orders considered in the auction (and concluded trades) shall be reported. For such orders the transaction timestamp shall represent the time at which the orders were placed and considered for the auction.

#### Example

**Commented [A10]: NOTE:** The guidance provided is based on FAQ 2.4.6.

#### Example

An order with order type "Stop-loss" order becomes visible in the order book of the OMP once it is activated. Until its activation such stop-loss orders should not be reported. An order with Stop-loss or any other trigger (e.g. profit-taking) should be reported with Action type N when it is activated in the order book.

#### Action type M

For the lifecycle events of orders with Action type M, the timestamp shall reflect the time of the business decision/event, e.g. time of change due to refilling a volume or matching an order. If the order is partially matched in several consecutive steps, this should also be visible from the different timestamps of the order's lifecycle records with Order status 'PMA' for 'Partially matched' in Data field (18) and Action type M that is to be reported for the visible and active order with the remaining quantity left for trading.

ACER expects that partially or fully matched orders and the corresponding trades have the same transaction timestamp expressed in UTC. If the trade takes place a few milliseconds/minutes after the orders have been matched, this timestamp (different from the transaction time) can be reported in the trade report in schema field 'executionTime' (child element of Data Field (37) Transaction timestamp in the REMITTable 1 schema).

In case the order was temporarily withdrawn at the end of the trading session (reported with Order status 'WIT' for 'Withdrawn' and Action type M) and later re-introduced in the next trading session with the same Order ID (reported with Order status ACT for 'Active' and Action type M<sup>3</sup>), reporting parties may decide to populate the 'originalEntryTime' in the order report (child element of the Data Field (37) Transaction timestamp in the REMITTable 1 schema) with the timestamp indicating the time when the order was originally entered in the market. In this case the transaction timestamp would reflect the new entry date and time for the latter session (i.e. when the order was re-introduced).

In general, Action type M is not considered applicable for **auction markets** where only the final orders submitted to the auction are considered reportable and the final trades, both reported with Action type N.

**Commented [A11]: NOTE:** The proposed guidance has been added for clarification in relation to auction data.

<sup>3</sup> Being subject to order condition and market rules

### Action type C

The timestamp of an order record reported with Action type C shall reflect the time for the cancellation (e.g. in case of the permanent withdrawal of the order by the market participant) or the expiration of the order (e.g. in case of orders with duration 'Good-till-date').

Action type C is always required to be reported when the end of the order's lifecycle cannot be derived from the information indicated in Data Field (17) Order condition or Data Field (22) Order duration. For more information, see Chapter 5.2.7.

For **auction markets**, it is important to note that orders submitted to the auctions but not matched eventually based on the auction results shall not be cancelled with Action type C since the end of the order's lifecycle can be derived from the fact that there was no corresponding trade reported upon the auction results containing the ID of the relevant order in Data Field (40) Linked order ID.

**Commented [A12]: NOTE:** The proposed guidance has been added for clarification in relation to auction data.

#### 5.2.4. Quantity information of an order when partially matched

For **continuous markets** Data Field (40) Quantity/Volume requires the specification of the number of units available and visible for trading, and the number of units matched. In addition, Data Field (21) Undisclosed volume shall indicate the volume that is not visible to the market for the order.

The quantity information relevant for an order is to be specified in the *quantity* section, as well as the *totalNotionalContractQuantity* section in the OrderList.

In case an order is partially matched, **the order record with order status 'PMA' representing the active order with available quantity left for trading** shall report the quantity information in the electronic format as follows:

1.  $Q_{\text{hidden outstanding}} = \text{Quantity remaining for trading as undisclosed volume}$
2.  $Q_{\text{visible outstanding}} = \text{Quantity remaining for trading being visible to the market}$
3.  $Q_{\text{matched}} = \text{Quantity matched that is resulting in a trade as a consequence of the matching process}$

The above-mentioned information is to be reported in the fields <Matched>, <Visible>, and <Undisclosed> available in the *quantity* section as well as the *totalNotionalContractQuantity* section in the OrderList.

In case the order has a partial match with visible quantity left for trading, while there is also hidden volume available from which the order can be re-filled, the following requirements shall apply: the quantity information in the order record with status 'PMA' is expected to specify the number of units remaining available and visible for trading, the undisclosed units and the number of units matched, depending on the relevant business scenarios (e.g. partial match, adding hidden volumes or refilling volumes). Otherwise, only the visible quantity is to be reported.

*Order status 'PMA' reported with Action type M shall always represent the active order with the visible and available quantity left for trading.*

In case the order record with status 'PMA' has no (more) undisclosed volume, value zero (0) shall be reported in the quantity field <Undisclosed> in the schema. In addition, it is important to note that the matched quantity reported in field <Matched> shall always indicate a point-in-time value (i.e. the quantity matched in that particular matching event which triggered the change in the order status, hence, resulted in a trade), and not the cumulative total of all quantities that were partially matched in previous events in the order's lifecycle. For further guidance, see examples related to the reporting of order lifecycle available in Annex II to the TRUM.

In case the order specification does not allow partial matching or undisclosed volumes, section *Visible* shall be selected within the *quantity* section and *totalNotionalContractQuantity* section in the OrderList, where the visible quantity of the order available for trading or the matched quantity shall be reported.

**Commented [A13]: QUESTION:** Stakeholders are invited to provide feedback on the revised requirements proposed to report partial matching and refilling from hidden volumes. For further information, please consult the relevant section in the revised REMITTable1 draft schema as well as the revised Examples 2.21, 2.22 and 2.54 in the draft Annex II to the TRUM, shared together with this annex for consultation.

For **auction markets**, order status 'PMA' is not considered applicable even if the quantity included in the resulting trade upon the auction results does not reflect the full quantity included in the final order submitted to the auction.

**Commented [A14]:** **NOTE:** The proposed guidance has been added for clarification in relation to auction data.

### 5.2.5. Representation of the order's lifecycle through the order status and action type

The following table aims to summarise the different combinations of order statuses with action types and describes how the given combination shall be interpreted in the data reporting.

Order status	Action type	Interpretation
ACT	N	In general, it represents the first lifecycle event of an active order in the sequence of a trading cycle reflecting the initial status, i.e. activation of the order (with the initial price, quantity and other order conditions).
MAC	N	Such combination represents that the first lifecycle event of an order was a matched order. The order will not be visible to the market as active order, as it gets matched immediately. This event may occur in case of orders traded on screen (e.g. on broker platforms) when the market participant is aggressing the initiator's order.
WIT	N	The combination is applicable for withheld orders. Withheld orders are inactive orders inserted in the order book. Upon their activation they become active orders, which are to be reported with order status 'ACT' and Action type 'M'. ACER does not request that such withheld orders are reported under REMIT, however, it aims to facilitate the REMIT reporting for those reporting parties who are entering into transactions related to such orders.
ACT	M	Such combination represents the modification of a tradable order by the means of price/quantity or other business decision OR re-activation of a temporarily suspended order OR re-activation of a temporary withdrawn order, being subject to market rules. The re-activation of the order by using the same Order ID and Contract ID can be combined with the modification of other order parameters, such as price, quantity, original entry time, etc.
REF	M	Such order status indicates that the quantity of a tradable order has been refilled from the Undisclosed Volume, reported in Data Field (21), as a consequence of the business decision. The refill may also be triggered by the matching of the disclosed/visible volume of the active order. The order condition for such orders shall indicate 'HVO' for 'Hidden Volume'.
COV	M	Such order status represents a tradable order reflecting the modification of the order type that has been changed from 'BLO' for 'Block' or 'VBL' 'Variable Block' to a single order with type 'COV' for 'Convertible', as a consequence of a business decision.
PMA	M	The order is modified as consequence of matching process in which the order was partially matched and is further tradable with a remaining visible, if the order conditions and market rules are met. In case of partial match, the order record with order status 'PMA' shall always specify the number of units remaining available and visible for trading, and number of units matched. If applicable, the hidden volume shall also be reported, otherwise value zero (0) shall be indicated.
MAC	M	An order is modified as a consequence of matching process i.e. is full matched and is not any more tradable; the Quantity/Volume indicated in order with this status represents the matched Quantity/Volume

PMA	C	The order was partially matched and cancelled due to the fact that for some reason it has not originated a trade. ACER expects such event occurring only exceptionally.
MAC	C	The order that was fully matched and was cancelled due to the fact that for some reason it has not originated a trade. ACER expects such event occurring only exceptionally.
WIT	M	An order has been temporarily withdrawn, i.e. deactivated, by the market by the participant (e.g. not tradable/visible on the screen), but can be re-activated, subject to market rules and order conditions
WIT	C	The order has been permanently withdrawn from the market by the participant (e.g. having order duration 'GTC' for 'Good Till Cancelled').
SUS	M	The order has been temporarily suspended by the system or the market operator from the trading (e.g. not tradable/visible on the screen anymore), but can be re-activated, being subject to market rules and order conditions.
SUS	C	The order has been permanently suspended from the trading by the system or the market operator (but not by the market participant)
EXP	C	The order has reached its expiration.

### 5.2.6. Fat finger error in order report

In case of the so called 'fat finger' error regarding the quantity, price, contract or other input in the order report that has been erroneously submitted to the OMP, subsequently matched and resulted in a trade, the reporting entity should inform ACER about the error via ARIS Central Service Desk (CSD) by opening a contingency report indicating the scenario related to the data quality issue.

*Orders that were activated (i.e. visible to the market) and originated in trades should NOT be invalidated with Action type E (error), even if so called 'fat finger' error occurs.*

Reporting parties should open a contingency in case they are contacted by a market participant regarding the error and requesting the OMP to cancel the transaction(s). In this case, if parties agree to cancel the trade due to the error made within the order, the trade has to be cancelled with Action type C. However, the order record shall remain as it was initially reported and made visible to the market and shall not be invalidated with Action type E nor modified with Action type M.

### 5.2.7. Reporting the end of the order lifecycle

In continuous markets, if an order has not been fully or at all matched and the order's expiration cannot be derived from the order duration, it is necessary to report a lifecycle event clarifying that the order is no longer on the market. The applicable order status combined with Action type C shall be reported.

The reporting of the end of the order's lifecycle to ARIS depends on different scenarios, i.e. the order was removed from the market because it was fully matched, the market participant/system/market operator removed it from the market, or the order expired. Regular combinations indicating the end of the order's lifecycle are the following:

- status 'PMA' with Action type M
- status 'MAC' with Action type M
- status 'WIT' with Action type C
- status 'EXP' with Action type C

If an order is fully matched, then the end of its lifecycle is reported with order status 'MAC' and Action type M. In case the order was removed from the market as a result of the market participant's action, the last order record should have order status 'WIT' and Action type C. This is also mandatory for orders reported as 'GTC' for 'Good till cancelled' in Data Field (20) Order duration.

In case the order expired because it had reached its duration, the last order record representing the end of the order's lifecycle should be reported with order status 'EXP' and Action type C.

An exception under such reporting requirements is the case when the end of the order's lifecycle (i.e. the expiration date and time) can be clearly derived from other fields reported within the record.

In order to clearly derive the expiration of the order from the order duration, the following shall apply:

Accepted values of Data Field (22) Order duration	Reference fields to identify the expiration of the order	If the reference field is not populated the following combination of Order status and Action type is expected to be reported as a final status of an order
Day (current day)	The expiration time is derived from the Transaction timestamp of the first record of the order reported with Action type N.	NA
SES (session or until gate closure)	Last Trading date and time (Data Field (36))	NA
GTT (Good till Time)	<i>Expiration Date Time</i> (child element of Data Field (22) Order duration in the REMITTable 1 schema)	Status 'EXP' + Action type C
GTD (Good till Date)	<i>Expiration Date Time</i> (child element of Data Field (22) Order duration in the REMITTable 1 schema)	Status 'EXP' + Action type C
OTH (Other)	<i>Expiration Date Time</i> (child element of Data Field (22) Order duration in the REMITTable 1 schema)	Status 'EXP' + Action type C
GTC (Good till Cancelled)	The expiration time is derived from the Transaction timestamp of the last record reported with Action type C.	Status 'WIT' + Action type C

However, it is important to note that even if the order's expiration can be derived from the order duration, ACER still recommends reporting the end of the order's lifecycle with the combination of the order status 'EXP' and Action type C.

### 5.3. Lifecycle events related to trades

#### 5.3.1. General considerations

As stated in the Guideline on REMIT transaction reporting, a trade report is a representation of any contract where two or more orders to trade were matched within an organised marketplace or an agreement on a bilateral trade which takes place off-market between two market participants, that specify a fixed price and quantity.

The following chapter aims to provide a non-exhaustive list of examples for events which may occur after a trade has been reported to ACER with Action type N.

Records of trades resulting from matched orders referring to standard supply contracts shall always be reported with Action type N, linked to the specific Order ID and indicating the ID of the contract the trade relates to.

For trades concluded bilaterally or Executions of non-standard contracts reported in Table 2, the Order ID is not applicable while the Contract ID is to be reported with a default value 'NA'.

For Executions the agreed Contract ID of the non-standard contract reported in Table 2 shall be indicated in Data Field (39) Linked Transaction ID. The Execution should refer to the parameters and conditions agreed in the non-standard contract and is reported with Action type N, as well.

The lifecycle of a trade compared to that of an order involves less modifiable parameters as it is considered a steady arrangement represented by specific economic parameters traded at one defined point in time (one-off). Therefore, ACER expects **minor and only occasional modifications by using Action type M** in the trade records.

The following section will specify how to report specific lifecycle events for trades concluded on an OMP or bilaterally, reported in Table 1.

### 5.3.2. Modification of price and/or quantity/volume

According to ACER's understanding in the context of trades related to standard contracts reportable in Table 1, **if during the delivery period or prior to the delivery** two parties agree to amend the price and/or the quantity of a concluded trade, this has to be considered as a new transaction executed at a different point in time, with different market information and leading to different economics. Hence, in such cases, first the concluded trade is expected to be early terminated by using Action type C. Secondly, a new transaction with a different UTI, but with the new price and/or quantity information as well as relevant delivery period shall be reported with Action type N. The new trade record shall, however, still refer to the original Contract ID reported in the cancelled trade record.

#### Example

##### Example

MP1 and MP2 agree in September 2026 on a yearly supply (forward) contract for the delivery of 10MW at 30 EUR/MW. Over July 2027 (or any month during the delivery of such a contract) the two parties decide to change the price or quantity. An early termination of the previous agreement should be reported (Action type 'C'), as well as a new transaction with Action type 'N', with a new UTI and with the new price and quantity (and the delivery period left).

ACER is aware that in some cases counterparties to a trade might decide to modify the quantity right after the conclusion of the trade but **before the start of the delivery period**. It is ACER's understanding that such modification cannot occur on an organised marketplace where the trade was concluded. If the change in the quantity occurs bilaterally, before delivery, and it is visible to the market, it is expected to be reported as modification with Action type M. On the other hand, if the modification occurs outside the organised marketplace without being visible to the market, then an early termination with Action type C of the existing trade should be reported first, followed by a new transaction submission with Action type N by indicating the modified quantity, even if the modification took place before delivery.

Regarding the price information, it may happen that the price of a standard contract to which the trade concluded on an organised marketplace refers to may be fixed by a formula. In such cases the price formula is to be reported in Data Field (46) Price formula, and Data Field (45) Price shall not be considered applicable. However, once the market participant can calculate the final outright price (e.g. by the time the relevant index values are known/published), the trade report must be updated by using Action type M in order to provide the information on the final outright price in Data Field (45) Price. Such a reporting requirement is considered crucial to ensure that the Table 1 record, which, by definition, must have a fixed price and quantity, has a complete and accurate set of information on the financial terms of the reported trade. On the other hand, transactions concluded bilaterally specifying a price

**Commented [A15]: NOTE:** The guidance provided is based on FAQ 2.1.10.

**Commented [A16]: QUESTION:** Stakeholders are invited to provide feedback on the highlighted reporting requirement for cases when the quantity of a trade concluded on an OMP is to be modified.

**Commented [A17]: QUESTION:** Stakeholders are invited to provide feedback on the highlighted guidance requirement proposed to be adopted to update the price information when there is a formula involved in a contract traded on an OMP (i.e., the contract is advertised on the venue by including a formula, meaning other than a simple index or just a deviation from an index).

formula shall be reported in Table 2, while the related Execution reports shall be submitted once the final price of the individual delivery reported is available.

### 5.3.3. Modification of the UTI for bilateral trades

It may happen that a market participant is unable to obtain the UTI from its counterparty within the required timeline to report their bilateral transaction.

In such a case the market participant may submit a record with Action type N by using temporary UTI in Data Field (38). Once the market participant receives the matching UTI from its counterparty, the previous record can be modified with the new, matching UTI in Data Field (38), with the condition that the schema field "AdditionalUtilInfo" is populated with the old (temporary) UTI reported previously.

Such a solution is possible only for bilateral trades reported in Table 1 where Data Field (33) Organised marketplace ID/OTC is populated with value 'XBIL'. This means that the above option is not possible when reporting trades concluded on an organised marketplace.

### 5.3.4. Cancellation of a trade

Whenever Action type C is used to indicate the end of the trade's lifecycle, no further lifecycle event (e.g. with Action type M) relating to the same UTI that occurred after the cancellation is allowed to be reported.

If two orders match and result in a trade that is then cancelled, or if for some reasons the matched orders do not originate in a trade, the order records shall not be modified. On the other hand, the relevant trade record shall be cancelled with Action type C (e.g. due to the 'fat finger error' issue in orders as described in Chapter 5.2.6) or not having available bilateral credit with counterparty or being prohibited from dealing with the counterparty or else).

### 5.3.5. Termination of a trade

Data Field (57) Termination date identifies the termination date of the trade, when the trade is terminated before the end of its delivery period. This implies that the trade gets terminated earlier than the delivery end date reported in Data Field (80). In this case, a lifecycle event with Action type C shall be submitted with the termination date indicating the due date and time when the bilateral trade is effectively terminated.

#### Example

In June, MP A and MP B traded a monthly forward contract for the month of July of the same year. During the delivery period, the market participants agreed to terminate the contract on 25 July instead of the original delivery end date of 31 July. In this case, a lifecycle event with Action type 'C' shall be reported, indicating the date of 25 July in this field. In Data Field (37) Transaction timestamp the date and time of the agreement on the early termination of the contract shall be reported.

### 5.3.6. Invalidation of a trade (due to erroneously submitted orders)

As described in Chapter 5.3.4, when a trade is cancelled because the related order was wrongly submitted to the trading system by the market participant, the trade shall be cancelled by using Action type C, instead of Action type E.

This relies on the fact that at that point in time when the order was erroneously submitted by the market participant, the order was visible to the market, and the matching event, triggering the trade, occurred based on that information that was visible to the market. On the other hand, Action type E is considered applicable when the record that was wrongly submitted to ARIS needs to be invalidated, i.e. to be identified as 'error'.

**Commented [A18]: NOTE:** The guidance provided is based on FAQ 3.1.17.

**Commented [A19]: NOTE:** The guidance provided is based on FAQ 2.4.11.

## 6. Lifecycle events of non-standard contracts reported in Table 2

### 6.1. Static information to be reported with Action type N

#### 6.1.1. Data Field (10) Contract ID

A bilateral contract with defined but not fixed price, quantity and/or delivery profile is to be reported in Table 2 by reporting the Contract ID as the uniquely identifier of the contract in Data Field (10). The Contract ID, as agreed between the market participants being the counterparties to the contract shall be used throughout the lifecycle of the contract, as well as in Data Field (39) Linked transaction ID in Table 1 applicable for the corresponding Execution report(s) to link the executions to the relevant non-standard contract. Once the non-standard contract is reported to ACER, any amendment to this contract (except for the information that considered static) should be reported as modification of the contract by using the same Contract ID reported in the first record.

If reporting parties erroneously report the Contract ID, they must correct all the corresponding records related to that wrong Contract ID. To do so, reporting parties must first submit records with Action type E for all impacted records (i.e. lifecycle events of the relevant non-standard contract, all related Execution reports) in order to invalidate them, then resubmit all the related reportable transactions with the correct Contract ID by using Action type N. The contract date and, for the Executions, the timestamps shall reflect the time at which the original contract was initially concluded, modified and/or executed.

### 6.2. Lifecycle events related to bilateral contracts

#### 6.2.1. Modification of price and/or quantity/volume

Non-standard contracts reported in Table 2 usually involve long-term (e.g. 5-10 year-long) agreements, therefore, unlike the trades relating to standard contracts, if the counterparties agree to change the price and/or quantity indicated in the contract (e.g. to increase the volume to be delivered or to amend the price index), such change is not considered a new agreement. This means that the counterparties may update the information related to the price and/quantity information of their bilateral contract in the respective data fields by using Action type M.

#### 6.2.2. Early termination of a contract

In situations where the counterparties decide (e.g. due to the business decision or bankruptcy) to early terminate the bilateral contract previously reported in Table 2 prior to the end of the contract's maturity, it is expected to be reported with Action type C. This reporting obligation applies to both counterparties. The record with Action type C shall also indicate the date when the cancelation of the contract was agreed in Data Field (11) Contract date. The effective termination date of the contract shall be indicated in Data Field (48) Delivery end date.

In case a non-standard contract reported in Table 2 needs to be early terminated, the already reported Executions reflecting concluded past deliveries shall not be cancelled.

#### 6.2.3. Invalidating a wrongly submitted contract

It may happen that a bilateral contract has been wrongly submitted in Table 2 by the market participant in one of the following ways

Case 1: providing a wrong Contract ID in Data Field (10)

Case 2: reporting the contract mistakenly to ARIS (i.e. the contract was not supposed to be reported at all), or

Case 3: providing wrong information about the details of the contract.

**Commented [A20]: NOTE:** Clarification provided on the requirement on not to cancel the related Executions reports.

**Commented [A21]: QUESTION:** Stakeholders are invited to provide feedback on the proposed guidance requirement for the presented three cases on the invalidation of a Table 2 bilateral contract.

Regarding Case 1, as described in Chapter 6.1.1 the bilateral contract has to be invalidated by using Action type E and then resubmitted with the correct Contract ID by using Action type N.

In Case 2, it is sufficient to invalidate the bilateral contract by reporting the transaction with Action type E.

In Case 3, the bilateral contract must be invalidated by using Action type E. Then a new record relating to the bilateral contract with the correct information shall be reported by using Action Type N. In this case, the information on the contract date needs to represent the date when the original contract was concluded. In such case, the lifecycle events (such as modifications) of the bilateral contract still pointing to the wrongly reported information has to be invalidated with Action type E. This implies that, unless the Contract ID was wrongly reported (Case 1), Executions reported in Table 1 related to the bilateral contract might not have to be invalidated.

It is important to note that in all three cases the reporting party must first invalidate all transaction records associated with the bilateral contract, including the Executions reported in Table 1, and then it can proceed with the invalidation of the original bilateral contract in Table 2.

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