Proposed text amendments to the Delegated Act for RRMs and IIPs (Ref. Ares(2025)6664047 - 18/08/2025)

Recital/Article	Commission Text	Proposed text amendments	Justification/Comments
Recital 6	To ensure legal certainty and reduce the administrative burden on IIPs and RRMs that were already established in the Union at the time of registration by the Agency, those IIPs and RRMs should not be required to resubmit documents that are already available to the Agency. Therefore, the authorisation process should contain specific provisions for them. Those IIPs and RRMs should be eligible for a simplified authorisation process, insofar as the Agency confirms to the relevant IIPs and RRMs that it has already received, during the registration process, all the information required for authorisation. However, the Agency should maintain the right to request the resubmission of documentation already provided during the registration process, if it is necessary to ensure compatibility with its IT systems, particularly in cases where technical updates are required.	To ensure legal certainty and reduce the administrative burden on IIPs and RRMs that were already established in the Union at the time of registration by the Agency, those IIPs and RRMs should not be required to resubmit documents that are already available to the Agency. Therefore, the authorisation process should contain specific provisions for them. Those IIPs and RRMs should be eligible for a simplified authorisation process, insofar as the Agency confirms to the relevant IIPs and RRMs that it has already received, during the registration process, all the information required for authorisation. ~~However, the Agency should maintain the right to request the resubmission of documentation already provided during the registration process, if it is necessary to ensure compatibility with its IT systems, particularly in cases where technical updates are required.~~	ACER's right to request *"resubmission of documentation already provided during the registration process, if it is necessary to ensure compatibility with its IT systems"* undermines the stated commitment for reduced administrative burden and simplified authorisation process. in practice, if ACER introduces a new authorization tool, as indicated during the joint EC-ACER roundtables in 2024, this would require currently registered IIPs and RRMs to restructure and resubmit the information already provided during their initial registration under Article 11 of the REMIT IR. This information has already been reviewed, validated, and accepted by ACER as complete and compliant. If the updated process requires the use of new system for authorization (i.e. web-forms), the attestation existing information would need to be reformatted, restructured, and reloaded to conform to the new input requirements. This re-submission process introduces an unnecessary administrative burden, given that the relevant information is already available within ACER's systems.
Recital 11	IIPs and RRMs should have in place sound information security systems that ensure the secure provision of disclosing and reporting services, prevent data breaches and security incidents, and guarantee continuity of services through back-up facilities. To ensure the security and resilience of network and information systems, IIPs and RRMs should implement appropriate and proportionate technical, operational, and organisational measures to manage risks and prevent or minimise the impact of incidents on recipients of their services. Those measures should be state-of-the-art and, where applicable, comply with relevant European and international standards.	IIPs and RRMs should have in place sound information security systems that ensure the secure provision of disclosing and reporting services, prevent data breaches and security incidents, and guarantee continuity of services through back-up facilities. To ensure the security and resilience of network and information systems, IIPs and RRMs should implement appropriate and proportionate technical, operational, and organisational measures to manage risks and prevent or minimise the impact of incidents on recipients of their services. ~~Those measures should be state-of-the-art and, where applicable, comply with relevant European and international standards.~~	Overall, the authorisation process and the set of requirements are disproportionate, overreaching and burdensome with the result that existing RRMs and IIPs will in reality not benefit of any "fast-track" procedures. Concerning the sentence: *"Those measures should be state-of-the-art and, where applicable, comply with relevant European and international standards."*, it adds additional burden to RRMs and IIPs, while it is very vague. We would propose deletion, as, in any case, each time applicable frameworks (European and/or international) delineate themselves their application scope.

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| Recital 17 | *To enable IIPs and RRMs to take all necessary actions to comply with the requirements introduced by this Regulation, the application of the provisions detailing the authorisations process, the organisational requirements, the supervision and reporting and the withdrawal and substitution processes should be deferred.* | *To enable IIPs and RRMs to take all necessary actions to comply with the requirements introduced by this Regulation, the application of the provisions detailing the authorisations process, the organisational requirements, the supervision and reporting and the withdrawal and substitution processes should be deferred*. **In the context of the Single Intraday Coupling (SIDC) established by Commission Regulation (EU) 2015/1222, a trade-matching system algorithm optimises the cross-border allocation of capacity by aggregating all orders submitted by market participants via the individual Nominated Electricity Market Operators (NEMOs) and the limitations imposed by the available cross-border capacity. Through that algorithm, the SIDC system facilitates the matching of orders across multiple NEMOs. The individual NEMOs do not possess the additional information generated in the context of that matching process which should be reported to the Agency on a continuous basis via an RRM. In order to allow the complaint of the NEMOS with Regulation (EU) No 1227/2011, the entity managing the trade-matching system, appointed by the NEMOs, must make available the information generated in the matching process to the NEMOs, or to a third party (service provider), appointed by the NEMOs, on their behalf. The NEMOs may request such entity or such third party (service provider) to submit, on their *behalf, such information to the Agency provided that the abovementioned entity or third party (service provider) qualifies as RRM.* "** | |

Article 2 (Definitions)	4. 'RRM client' means an entity subject to reporting obligations pursuant to Articles 7c and 8 of Regulation (EU) No 1227/2011, on whose behalf the RRM submits data records to the Agency, or an entity that, for the purposes of order book reporting pursuant to Article 8(1a) of Regulation (EU) No 1227/2011, is listed in Article 8(4), point (d), of Regulation (EU) No 1227/2011;		Although we do not submit any amendment proposal to the definition of a 'RRM client', the latter shall apply exclusively for the purposes of this Regulation and shall not be interpreted as affecting and interfering with the application of contractual relations between the organized marketplaces and market participants. In accordance with the order book reporting pursuant to Article 8(1a)a of REMIT Regulation, OMPs are responsible for submitting data to ACER on behalf of all market participants trading on their platform, thereby fulfilling market participants' reporting obligations. In addition, under the revised REMIT IR, and with the future reporting of exogenous data, the frequency and intensity of interactions between OMPs and their MPs might even increase and be further reinforced.
Article 3 (Identification and legal status of the applicant and access to the Agency's data exchange systems)	1. The application shall identify the applicant and the activities that it intends to carry out and that require it to be authorised as an IIP or a RRM.	1. The application shall identify the applicant and the activities that it intends to carry out and that require it to be authorised as an IIP or a RRM. **The description of such activities will clarify whether the RRM intends to report exclusively its own data, to report on behalf of market participants and other entities listed in Article 8(4) point (d) of Regulation** No 1227/2011, or both **or in the name and on behalf of the NEMOs with respect to single intraday coupling data**	

Article 4 (2) (Supporting Documents)	Art 4 (2): The application shall include the following: [...] (h) information on the procedures to ensure the orderly substitution of the IIP or the RRM in case such substitution is the result of a withdrawal of the authorisation, including the procedures for the transfer of data and the redirection of the services provided to another IIP or RRM, as set out in Articles 38 and 39, including the related supporting documents;	(h) information on the procedures to ensure the orderly substitution of the IIP or the RRM in case such substitution is the result of a withdrawal of the authorisation, including the procedures for the transfer of data ~~and the redirection of the services provided to another IIP or RRM~~, as set out in Articles 38 and 39, including the related supporting documents;	We do not support the data transfer from withdrawn RRM/IIP to a multitude of active RRMs/IIPs. Given that the withdrawn RRM/IIP has in place established communication channels with its clients, we propose that the data transfer be organized from the withdrawn RRM/IIP to their clients. The proposal is further elaborated in our comments to Article 38 below.
Article 4 (3)	The organisational chart of the IIP or RRM referred to in paragraph 2, point (d), shall: (a) display the group structure and ownership links between the parent undertaking and its subsidiaries or any other associated entities or branches, and indicate their respective activities; (b) indicate the legal name and address of the undertakings shown in the organisational chart; (c) identify the persons responsible for reporting of data records or operating the platform for the disclosure of information and submission of inside information reports to the Agency and provide descriptions of their tasks and business contact details.	The organisational chart of the IIP or RRM referred to in paragraph 2, point (d), shall: ~~(a) display the group structure and ownership links between the parent undertaking and its subsidiaries or any other associated entities or branches, and indicate their respective activities;~~ ~~(b) indicate the legal name and address of the undertakings shown in the organisational chart;~~ (c) identify the persons responsible for reporting of data records or operating the platform for the disclosure of information and submission of inside information reports to the Agency and provide ~~descriptions of their~~ *~~tasks~~* ***information about their function*** and business contact details.	The information requested in Article 4(3)(a) and (b) is already required by Article 3(2)(f), which asks applicants to identify any subsidiaries and their group structure during the application process. Similarly, the information requested in Article 4(3)(c) is a duplicate of the "programme of operations" required by Articles 4(2)(e) and 4(4). We therefore suggest removing these redundant requirements to avoid asking for the same information multiple times within the Regulation and ensure correspondence with the objectives for simplification of the authorization process.

| Article 4 (4) (Supporting Documents) | The programme of operations referred to in paragraph 2, point (e), shall describe in detail the operational framework, internal control mechanisms and the way in which regulatory compliance with this Regulation and Regulation (EU) No 1227/2011 is ensured. The description of the operational framework shall illustrate the business model of the applicant, including the services and products offered, and indicate any relevant outsourcing arrangements, in which case it shall specify how such outsourcing arrangements ensure compliance with the requirements laid down in this Regulation and with Regulation (EU) No 1227/2011. The description of the internal control mechanisms shall illustrate the mechanisms to ensure effective governance and risk management, procedures and systems for monitoring and managing risks, including the identification of potential risks and corresponding mitigation strategies. The description of regulatory compliance shall specify in detail how compliance with the requirements laid down in this Regulation and in Regulation (EU) No 1227/2011 is ensured. | The programme of operations referred to in paragraph 2, point (e), shall describe in detail the operational framework, internal control mechanisms and the way in which regulatory compliance with this Regulation and Regulation (EU) No 1227/2011 is ensured. The description of the operational framework shall illustrate the business model of the applicant, including the services and products offered, and indicate any relevant outsourcing arrangements, in which case it shall specify how such outsourcing arrangements ensure compliance with the requirements laid down in this Regulation and with Regulation (EU) No 1227/2011.**It remains understood that should any of such information be covered by other applicable law provisions (e.g., cybersecurity) any disclosure thereof may be carried out only after the relevant authorization are provided by the competent authorities.** ~~The description of the internal control mechanisms shall illustrate the mechanisms to ensure effective governance and risk management, procedures and systems for monitoring and managing risks, including the identification of potential risks and corresponding mitigation strategies.~~ ~~The description of regulatory compliance shall specify in detail how compliance with the requirements laid down in this Regulation and in Regulation (EU) No 1227/2011 is ensured.~~ | The requirement to describe "regulatory compliance" is too broad and does not clarify how it differs from the information already required under Article 4.

Information governed by other legal provisions, such as cybersecurity rules, should not be made public. Unauthorized disclosure could result in legal consequences, including fines. Adherence to this non-disclosure rule is essential for safeguarding data integrity, confidentiality, and compliance. |

Art 4 (5) (Supporting Documents)	IIP applicants shall provide to the Agency information about the time needed by the IIPs to disclose on their platform the information received from their IIP clients. IIP applicants shall provide to the Agency information about the manner in which they set the fees to be paid by their IIP clients in accordance with Article 25.	IIP applicants shall provide to the Agency information about the time needed by the IIPs to disclose on their platform the information received from their IIP clients, **that has been successfully validated through their data validation system.** IIP applicants shall provide to the Agency ~~information about the manner in which they set~~ the fees to be paid by their IIP clients in accordance with Article 25.	We propose that the first sentence of Article 4(5) clarifies that the IIPs are required to provide information about the time it takes to internally process and publish data, but only when it was successfully validated and approved. This requirement cannot be applied in situations where data is rejected and needs to be corrected and resubmitted. Such cases are beyond the scope of the IIP's control and necessitate additional communication and delays. To avoid any potential misunderstandings, it is recommended that this distinction be explicitly outlined. This ensures that IIPs are evaluated only for the time it takes them to publish data that has been fully validated and accepted. Concerning the disclosure of the manner of which IIPs set their fees: The disclosure of such commercially sensitive information is not necessary because IIPs are in a competitive environment and market participants can choose their preferred service provider.
Article 4(6) (Supporting Documents) together with Article 15 (Data transfers)	*Article 4(6)* RRM applicants shall provide supporting documents regarding the systems they have in place to ensure data transfers from other systems or platforms in accordance with Article 15. RRM applicants shall indicate the name of such systems or platform, and of any user facilities generating reportable data to the technical solution implemented by the applicant, including any data transformation. *Article 15* **Data transfers** IIPs and RRMs shall have in place systems for effective data transfers from other systems or platforms ensuring an efficient data collection process and subsequent reporting to the Agency.		It is not clear what is meant by "*other systems or platforms*" and "*and of any user facilities generating reportable data to the technical solution*". It should be clarified whether this refers to the systems used by the RRM/IIP clients (such as MPs, OMPs, or trade-matching systems), or to solutions implemented by the RRM/IIP or their service providers for generating reports. The current wording leaves room for different interpretations, and greater clarity is needed to understand the scope of the requirement and the systems it covers.

Article 7 (Request for additional information during the authorisation process)	*Request for additional information during the authorisation process* Upon request by the Agency, applicants shall provide additional information during the examination of their application, where such information is necessary for the Agency to assess the completeness of their application and the applicants' compliance with the requirements set out in this Regulation and in Regulation (EU) No 1227/2011.	Request for ~~additional information~~ **clarifications** during the authorisation process Upon request by the Agency, applicants shall provide ~~additional information~~ **clarifications or supplementary details** during the examination of their application, where such information is necessary for the Agency to assess the completeness of their application and the applicants' compliance with the requirements set out in this Regulation and in Regulation (EU) No 1227/2011.	The provision should be revised to specify that requests for "*additional information*" during the application process are limited to clarifications or supplementary details regarding information already mandated by the Regulation. This would align with the "*request for clarification*" mentioned in Article 10(6).
Article 8 (Application process for IIPs and RRMs already registered and established in the Union)	*Application process for IIPs and RRMs already registered and established in the Union* 1. IIPs and RRMs that have already been registered by the Agency and were already established in the Union at the time of registration shall apply for an authorisation from the Agency pursuant to Article 10 before [*OP: Please insert the date = 18 months after the date of entry into force of this Regulation*], in accordance with the rules set out in Articles 3 to 7. 2. IIPs and RRMs referred to in paragraph 1 of this Article shall, in their application, provide the Agency with the information referred to in Articles 3 to 7, unless that information was already provided in the framework of the registration process.	*Application process for IIPs and RRMs already registered ~~and established in the Union~~* 1. IIPs and RRMs that have already been registered by the Agency ~~and were already established in the Union at the time of registration~~ shall apply for an authorisation from the Agency pursuant to Article 10 before [OP: Please insert the date = 18 months after the date of entry into force of this Regulation], in accordance with the rules set out in **~~Articles 3 to 7~~ this Article**. 2. IIPs and RRMs referred to in paragraph 1 of this Article shall, in their application, provide the Agency with **following** information ~~the information referred to in Articles 3 to 7, unless that information was already provided in the framework of the registration process~~: a. ... b. ... ... 3. ~~The Agency shall inform the IIPs and RRMs referred to in paragraph 1 if additional information is necessary to assess the completeness of the application and the applicants' compliance with the requirements set out in this Regulation and in~~	The new draft should provide a clearer Fast Track for RRMs and IIP already registered and established in the Union. Even though more information is provided by the new article, the authorization process remains expensive and with a certain degree of uncertainty. If there is reference in Art 8 (1) to Articles 3-7 there is in fact no Fast Track. These rules have to be clearly and materially different and hence, we propose to refer only to this Article, i.e. Article 8. Then, to provide the necessary legal certainty and compliance with REMIT Regulation, we propose to formulate the complete and exhaustive list of documents to be required from existing and established RRMs and IIPs in paragraph 2. We do not present a proposal for such a list, however we believe it necessary in order to fulfill REMIT mandate for DA. In accordance with REMIT, the rules for Fast Track for existing RRMs and IIPs have to be specified in DA, not in the ACER guidance. Such guidance would have clearly affect RRMs and IIPs rights and as such, all such provisions should be included in DA itself and not guidance. **Regarding Paragraph 1** Some IIPs and RRMs that are already registered by the Agency are companies in Norway, but should still have the same opportunity to apply for the 'fast track' procedure.

	3. The Agency shall inform the IIPs and RRMs referred to in paragraph 1 if additional information is necessary to assess the completeness of the application and the applicants' compliance with the requirements set out in this Regulation and in Regulation (EU) No 1227/2011.	~~Regulation (EU) No 1227/2011.~~ **RRMs and IIPs referred to in paragraph 1 shall receive confirmation by the Agency of their compliance with some or all requirements for authorisation detailed in this Regulation without undue delay after their application pursuant to paragraph 1. To this extent, they shall be exempt from proving compliance with those requirements for the purposes of their authorization.**	Deletion also of the words '*and established in the Union*' from the heading of the Article.

We support the position where RRMs/IIPs (already registered) should only have to notify ACER if they want to renounce their authorization, in order to guarantee the business continuity. |
| Article 9 (Guidance by the Agency) | *No later than [OP: please insert the date = 7 months after the date of entry into force of this Regulation], the Agency shall provide guidance on the following:*

(a) the technical process for the testing phase as referred to in Article 5(1);

(b) the application process for IIPs and RRMs already registered and established in the Union as referred to in Article 8(1);

(c) the data validation principles and processes as referred to in Article 12(1) and (2) by providing technical standards for the verification of data;

(d) the security measures referred to in Article 13(1), point (d);

(e) the format of the report on unplanned downtime or disruption as referred to in Article 18(3);

(f) the flagging process set out in Article 24(4), if applicable; | No later than [OP: please insert the date = 7 months after the date of entry into force of this Regulation], the Agency shall provide guidance on the following:

(a) the technical process for the testing phase as referred to in Article 5(1);

~~(b) the application process for IIPs and RRMs already registered and established in the Union as referred to in Article 8(1);~~

(c) the data validation principles and processes as referred to in Article 12(1) and (2) by providing technical standards for the verification of data;

(d) the security measures referred to in Article 13(1), point (d);

(e) the format of the report on unplanned downtime or disruption as referred to in Article 18(3);

~~(f) the flagging process set out in Article 24(4), if applicable;~~

(g) the mechanisms to identify completeness, omissions and obvious errors in inside information reports and data records as referred to in Article 23(1) for IIPs and Article 27(1) for RRMs;

(h) the format of the annual report as referred to in Article 33(1) | The deletion of letter (b) is in relation to our proposal for text amendment of Article 8 above.

We are proposing the deletion of letter (f) of Article 9, as it is related to guidance for the flagging process, subject of Article 24(4). Detailed reasoning for our objection to the provisions for flagging invalid data by the IIPs is provided in the comments to Article 24(4).

As the guidance by ACER can take up to 7 months after entry into force, this minimises the implementation period for several Articles, as we need to deduct the months ACER is taking up for providing the guidance. The implementation deadline and guidance publication shorten the deadline for RRMs.
The implementation time increased should be respectively increased. |

	(g) the mechanisms to identify completeness, omissions and obvious errors in inside information reports and data records as referred to in Article 23(1) for IIPs and Article 27(1) for RRMs; *(h) the format of the annual report as referred to in Article 33(1).*	**(i) the joint reporting of single intraday data of the NEMOs**	
Article 16 (Conflict of Interest)	1. IIPs and RRMs shall maintain effective administrative arrangements, designed to prevent conflicts of interest with their IIP clients and RRM clients. Such arrangements shall include policies and procedures for identifying, managing and disclosing existing and potential conflicts of interest and shall: (a) ensure that the relevant IIP clients and RRM clients are aware of those policies and procedures; (b) ensure the separation of duties and business functions within the IIP or RRM, including through: (i) measures to prevent or control the exchange of information where a risk of conflicts of interest may arise; (ii) the separate supervision of relevant persons whose main functions involve interests that are potentially in conflict with those of IIP clients or RRM clients; (iii) measures to remedy potential or existing conflicts of interest; (c) map any existing and potential conflicts of interest and list them in	**1. Applicants shall operate and maintain effective administrative arrangements, designed to prevent conflicts of interest with their clients, unless the client and the RRM are the same legal entity. For this purpose, applicants shall provide an assessment where such conflicts of interest can occur, and to which extent these arrangements are deemed necessary. Such arrangements shall include policies and procedures for identifying, managing and disclosing existing and potential conflicts of interest and shall contain:** ~~IIPs and RRMs shall maintain effective administrative arrangements, designed to prevent conflicts of interest with their IIP clients and RRM clients. Such arrangements shall include policies and procedures for identifying, managing and disclosing existing and potential conflicts of interest and shall:~~ ~~(a) ensure that the relevant IIP clients and RRM clients are aware of those policies and procedures;~~ ~~(b) ensure the separation of duties and business functions within the IIP or RRM, including through:~~ ~~(i) measures to prevent or control the exchange of information where a risk of conflicts of interest may arise;~~ ~~(ii) the separate supervision of relevant persons whose main functions involve interests that are potentially in conflict with those of IIP clients or RRM clients;~~	

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<td>an inventory, which shall contain their description, identification, prevention, management and disclosure.

2. IIPs and RRMs shall have policies in place to ensure the handling of the reported data in a non-discriminatory manner.</td>
<td>(iii) measures to remedy potential or existing conflicts of interest;

(c) map any existing and potential conflicts of interest and list them in an inventory, which shall contain their description, identification, prevention, management and disclosure.
2. IIPs and RRMs shall have policies in place to ensure the handling of the reported data in a non-discriminatory manner.</td>
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Article 17	[...] 3. [...] (f) comprehensive data back-up measures ensuring no data losses, including retention of data reported to the Agency in the last five years after the termination of the corresponding event for IIPs and five years for RRMs; (g) effective business continuity arrangements addressing unplanned events, including the following: (i) arrangements for the continuity of the processes which are critical to ensuring the effectiveness of data reporting services, including escalation procedures, relevant outsourced activities or dependencies on external providers, which as regards an IIPs back-up infrastructure, may include contractual arrangement with another IIP authorised by the Agency where IIP clients will be automatically redirected for the disclosure of their information in case of an incident, at no additional cost for the IIP client; (ii) specific continuity arrangements, covering an adequate range of possible scenarios, in the short and medium term, including system failures, natural disasters, communication disruptions, loss of key staff and inability to use the premises regularly used; (iii) the establishment of failover and fallback procedures that specify the	3. [...] (f) comprehensive data back-up measures ensuring no data losses, including retention of data reported to the Agency in the last five years after the termination of the corresponding event for IIPs and ~~five~~ **two** years for RRMs; (g) effective business continuity arrangements addressing unplanned events, including the following: (i) arrangements for the continuity of the processes which are critical to ensuring the effectiveness of data reporting services, including escalation procedures, relevant outsourced activities or dependencies on external providers, ~~which as regards an IIPs back-up infrastructure, may include contractual arrangement with another IIP authorised by the Agency where IIP clients will be automatically redirected for the disclosure of their information in case of an incident, at no additional cost for the IIP client;~~ (ii) specific continuity arrangements, covering an adequate range of possible scenarios, in the short and medium term, including system failures, natural disasters, communication disruptions, loss of key staff and inability to use the premises regularly used; (iii) the establishment of failover and fallback procedures that specify the automatic redirection of IIP clients for the disclosure of their information to back-up IIP facilities; (iv) the establishment of a target maximum recovery time for critical functions; (v) the provision of obligatory staff trainings on the operation of business continuity; (vi) the identification of key personnel responsible for business continuity, including the identification	**Regarding Paragraph 3** Enforcing cross platform redirection raises significant operation legal and security risks. Those risks outweigh any incremental benefits from already implemented business continuity measures. We would also advocate for a data retention of 24 months as initially presented by ACER in the round table of 17.09.2024, instead of the five years. **Regarding Paragraph 4** The IIPs and RRMs will be required to implement the framework of an internationally recognized standard for information security. It is important to note that ISO 27001 does not mandate a full remediation, but rather permits the mitigation of specific risks in certain scenarios. In this regard, we recommend that mitigation measures be allowed when remediation is not technically feasible or would require disproportionate costs. This approach ensures efficient use of resources while maintaining acceptable risk and system integrity. **Regarding Paragraph 6** It seems appropriate to reduce the performance standards (set at 99.5% of operating hours), which are too high for a "new" service. The requirement of 99.5% system availability is absolutely unfeasible – it translates into a mere 43 hours of unavailability per year. This requires 24/7 technical support (huge costs) and appropriate, very expensive technical solutions. Even for network services, overnight repairs are rarely guaranteed. The requirement of 95% system availability is an absolute maximum.

automatic redirection of IIP clients for the disclosure of their information to back-up IIP facilities;
(iv) the establishment of a target maximum recovery time for critical functions;

(v) the provision of obligatory staff trainings on the operation of business continuity;
(vi) the identification of key personnel responsible for business continuity, including the identification of personnel responsible for immediate reaction to a disruption of services.

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

5. IIPs shall make available to the public all information related to the alternative means of disclosure that their IIP clients can use in case of a downtime of the platform. When planned maintenance may result in disruptions, it shall be planned for time windows where minimal activity is foreseen.

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

of personnel responsible for immediate reaction to a disruption of services.

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

5. IIPs shall make available to the public all information related to the alternative means of disclosure that their IIP clients can use in case of a downtime of the platform. When planned maintenance may result in disruptions, it shall be planned for time windows where minimal activity is foreseen.

6. IIP services related to the disclosure and publication of information and submission of inside information reports shall be available at least ~~99.5%~~ **95%** of the time **and progressively increasing to 99.5%**. The same applies where IIP services or parts thereof are outsourced to external providers.

7. In the exceptional circumstance where IIP clients have been notified by the IIP of planned maintenance or unplanned downtime or other disruption in accordance with Article 18, or the IIP clients themselves notice that neither the IIP nor its back-up facilities are in operation, the IIP clients shall exceptionally disclose on their website the information they would have disclosed on the IIP, until the IIP or its back-up facilities are restored.

8. IIPs shall publish on their platform the information disclosed by their IIP clients in accordance with paragraph 7 as soon as it is technically possible after the restoration of the services.

	7. In the exceptional circumstance where IIP clients have been notified by the IIP of planned maintenance or unplanned downtime or other disruption in accordance with Article 18, or the IIP clients themselves notice that neither the IIP nor its back-up facilities are in operation, the IIP clients shall exceptionally disclose on their website the information they would have disclosed on the IIP, until the IIP or its back-up facilities are restored. 8. IIPs shall publish on their platform the information disclosed by their IIP clients in accordance with paragraph 7 as soon as it is technically possible after the restoration of the services.		

Article 18 (Planned maintenance or unplanned downtime or other disruption)	[...] 3. IIPs and RRMs shall notify the Agency of any unplanned downtime or other disruption affecting their ability to comply with the requirements laid down in Articles 11 to 29 within 24 hours of becoming aware of the disruption. No later than one month after becoming aware of the disruption, IIPs and RRMs shall submit a report to the Agency detailing the causes of the disruption and the actions taken to prevent any reoccurrence. 4. The Agency may ask for additional information or clarifications in relation to the IIPs' and RRMs' compliance with the requirements set out in this Article.	[...] 3. IIPs and RRMs shall notify the Agency of any unplanned downtime or other disruption **including any event resulting in a reporting that is incomplete, inaccurate or late,** affecting their ability to comply with the requirements laid down in Articles 11 to 29 within **one working day ~~24 hours~~** of becoming aware of the disruption. No later than one month after becoming aware of the disruption, IIPs and RRMs shall submit a report to the Agency detailing the causes of the disruption and the actions taken to prevent any reoccurrence. 4. The Agency may ask for additional information or clarifications in relation to the IIPs' and RRMs' compliance with the requirements set out in this Article.	The terms unplanned downtime or other disruption should be clearly defined. The definition should explicitly encompass any event resulting in a reporting that is incomplete, inaccurate or late. Including these cases would help guarantee that RRMs retain the ability to open contingency reports as it is currently the case. Alternatively, though less preferably, ACER's guidance that will provide details on the format of the report on unplanned downtime or disruption, pursuant to article 9 (e) of this Regulation, should clearly specify that any event resulting in a reporting that is incomplete, inaccurate or late falls under the definition of an unplanned downtime or other disruption. The provisions of the services offered by the IIPs/RRMs involve massive regulatory, technical and organizational interventions. Given the impacts resulting from these interventions, it seems appropriate to review the timing of communication to the Agency of any malfunctions of the platforms.
Art 19 (4) (Operation of the Platform)	The IIP platform shall allow for: (a) the filtering of disclosed information, including historical information, by relevant data categories; (b) the downloading of filtered information in a format that conforms to a standard structure and naming convention, in line with Annex II;	The IIP platform shall allow for: (a) the filtering of disclosed information, including historical information, by relevant data categories; (b) the downloading of filtered information **manner that preserves the secure operation and** to **guarantee the disclosure of inside information,** in a format that conforms to a standard structure and naming convention, in line with Annex II; (c) the downloading of filtered information and any further use of the downloaded information for legitimate **non-commercial** purposes free of charge.	

	(c) the downloading of filtered information and any further use of the downloaded information for legitimate purposes free of charge.		
Article 20 (Submission of inside information reports)	IIPs shall have in place a procedure and the technical means to report to the Agency, in a standard electronic format established by the Agency in line with Annex II, all information disclosed on their platform that has been successfully validated through their data validation system, including any subsequent modifications, no later than one day following the disclosure or modification.	IIPs shall have in place a procedure and the technical means to report to the Agency, in a standard electronic format established by the Agency in line with Annex II, all information disclosed on their platform that has been successfully validated through their data validation system, including any subsequent modifications, no later than one **working** day following the disclosure or modification.	

| Article 21 – equal treatment in the provision of services | *IIPs shall have in place a procedure and the technical means to provide non-discriminatory access to their services to all market participants and authorities competent for emergency planning that are to ensure publication in accordance with Article 3(4), point (c), of Regulation (EU) No 1227/2011.* | IIPs shall have in place a procedure and the technical means to ~~provide~~ ***ensure*** non-discriminatory **treatment of their clients when providing** access to their services.~~to all market participants and authorities competent for emergency planning that are to ensure publication in accordance with Article 3(4), point (c), of Regulation (EU) No 1227/2011.~~ | The proposed provision in Article 21 requires IIPs to offer publication services to all market participants and competent authorities with an obligation to disclose inside information. While the objective of ensuring fair and transparent access is acknowledged, the current wording would, in practice, exclude certain IIPs from continuing their operations under existing models - favoring other platforms.

Currently, some IIPs provide publication services exclusively to their members.
Others operate based on a mandate from the relevant NRA, offering services solely to market participants and competent authorities within their respective Member State.
Additionally, certain IIPs focus on specific segments of the market, serving only gas or only electricity market participants.

The current model has ensured continued market transparency and has not resulted in negative impact on stakeholders.
Moreover, the non-discriminatory access requirements set out in Articles 4a(3) and 4a(5) of REMIT pertain to stakeholder access to the published inside information — not to an obligation for IIPs to provide publication services to all market participants.

In light of this, we strongly recommend revising Article 21 to allow IIPs to restrict access to their publication services based on transparent and objective criteria, such as market segment or membership. This should be permitted provided that the published inside information remains freely and equally accessible to all stakeholders, in full compliance with REMIT's transparency requirements. |

Art 22(d) together with Article 26(c)	Art 22(d) The IIP data validation systems referred to in Article 12 shall:	The IIP data validation systems referred to in Article 12 shall:	The authorisation of individuals or systems to submit data to the IIP/RRM is handled as part of the onboarding process and is not subject to validation on a per-record basis.
Article 22(d)	(d) enable the authentication of the source of information and verify the following: (i) the identity of the IIP client; (ii) the identity of any other person submitting information on behalf of the IIP client; (iii) that persons submitting information on behalf of an IIP client are properly authorised to do so.	(d) enable the authentication of the source of information and verify the following: (i) the identity of the IIP client; (ii) the identity of any other person submitting information on behalf of the IIP client; ~~(iii) that persons submitting information on behalf of an IIP client are properly authorised to do so.~~	Following the onboarding process, the IIP/RRM is not in a position to validate the client-side authorisation for each individual record.
Article 26(c)	Art 26(c) The RRMs' data validation systems referred to in Article 12 shall: (c) enable the authentication of the source of information and verify the following: (i) the identity of the RRM client; (ii) the identity of any other person submitting information on behalf of the RRM client; (iii) that persons submitting information on behalf of a RRM client are properly authorised to do so.	The RRMs' data validation systems referred to in Article 12 shall: (c) enable the authentication of the source of information and verify the following: (i) the identity of the RRM client; (ii) the identity of any other person submitting information on behalf of the RRM client; **~~(iii) that persons submitting information on behalf of a RRM client are properly authorised to do so.~~**	

| Article 23 (Detection and correction of invalid inside information reports before submission to the Agency) | 1. Where data validation systems detect or identify any data inconsistencies or missing data ('invalid data'), prior to the disclosure of the information on the IIP platform or the submission of inside information reports to the Agency, IIPs shall provide their IIP clients with detailed information regarding the validation results and shall request the clients to resubmit the information to the IIP with the necessary corrections or missing data. When receiving that information from the clients, the IIP shall resubmit those reports to the Agency as soon as technically possible.

2. IIPs shall maintain a register of invalid data submitted by their IIP clients. That register shall include information on whether the IIP client has successfully submitted the correct data. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which IIP clients submitted invalid data as well as the identity of such clients. | 1. Where data validation systems detect or identify any data inconsistencies or missing data ('invalid data'), prior to the disclosure of the information on the IIP platform or the submission of inside information reports to the Agency, IIPs shall provide their IIP clients with detailed information regarding the validation results and shall request the clients to resubmit the information to the IIP with the necessary corrections or missing data. When receiving that information from the clients, the IIP shall ~~re~~submit those reports to the Agency as soon as technically possible.

~~2. IIPs shall maintain a register of invalid data submitted by their IIP clients. That register shall include information on whether the IIP client has successfully submitted the correct data. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which IIP clients submitted invalid data as well as the identity of such clients.~~ | **Regarding Paragraph 1**
There is an inconsistency in the first paragraph, as the validation shall be done Prior to the submission of the information to the Agency, the resubmission to the agency is only relevant if the inconsistencies or invalid data are discovered after the initial submission.

Regarding Paragraph 2
We are concerned about the proposed requirement for IIPs to maintain a register of invalid records, including whether clients have subsequently submitted corrected data. While we understand the intention to monitor uncorrected or unpublished UMMs, the requirement is technically complex, operationally burdensome, and inconsistent with the principle of proportionality.

Establishing such a register would require IIPs to build sophisticated systems capable of storing, indexing, and matching rejected records with later client submissions. This imposes a significant financial and operational burden, particularly as IIPs are service providers - not entities responsible for supervising client compliance.

To effectively match corrected data with rejected submissions, IIPs would need to store all invalid data and implement tracking mechanisms. However, this is complex and problematic because:
• Corrected UMMs are modified and do not include a static or unique identifier to provide link with the original message;
• Rectified messages will be submitted in entirely separate batches, with no technical reference to the original rejected data, making correlation difficult.
The requirement also fails to consider differences in reporting modes.
In manual publication mode, IIPs already provide real-time validation through their user interface. Clients are alerted to errors as they input data, with invalid records prevented from being submitted, stored, or retained.
As a result, introducing a register of invalid submissions would lead to unequal treatment between manual and automated |

			UMM publication, undermining the principle of non-discrimination. Finally, IIPs are not enforcement bodies and cannot be tasked with monitoring or ensuring client compliance. We therefore recommend that the obligation to maintain a register of invalid records be removed. Instead, regulatory focus should be directed toward increasing awareness among market participants and improving overall compliance, rather than introducing technically disproportionate requirements for IIPs.

| Article 24 (Receipt of inside information reports submitted by IIPs) | 1. When receiving inside information reports, the Agency shall issue receipts to the IIPs. Those receipts shall include at least the following information:

(a) the identification of the submitted inside information report;

(b) an indication of whether the inside information report has been successfully collected by the Agency.

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

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

If the error is attributable to the IIP clients, the IIP shall provide those clients with guidance on how to correct the inside information report and shall subsequently submit the corrected inside information report to the Agency within five working days.

3. IIPs shall implement automated alert systems capable of performing the following actions: (a) notify the IIP clients of the Agency's receipt; | 1. ~~When~~ **Immediately after** receiving inside information reports, the Agency shall issue receipts to the IIPs. Those receipts shall include at least the following information:

(a) the identification of the submitted inside information report;

(b) an indication of whether the inside information report has been successfully collected by the Agency.

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

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

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

3. IIPs shall implement automated alert systems capable of ~~performing the following actions: (a)~~ notify the IIP clients of the Agency's receipt;

~~(b) transmit~~ to the IIP **shall provide on request** client a copy of the IIP client's inside information reports as submitted to the Agency. | As already indicated, IIPs cannot implement any activity without VR published by Acer.

Justification on par (1, 2) :
The provision of the ACER receipt to the IIP is a critical component of IIP operational procedures. It is of outmost importance that ACER receipts are provided to the IIP as soon as possible in order to ensure smooth operation of the IIP, proper processing to ACER of the subsequent reports, timely data rectification and resubmission to ARIS. Finally, the requirement for IIPs "*to provide guidance to their clients*" on how to rectify the data could be interpreted as case-based prescriptive instructions which are not feasible and do not correspond to the requirement of subparagraph (a) of this Article for automatisation of the process. The IIP can inform the client about the rejection, the reason for rejection specified in ARIS receipt and the problematic data fields. This shall be sufficient for the client to rectify the problem – as it is the case when the IIP should rectify a report solely based on ARIS receipt, without specific guidance from ACER. We therefore recommend removing the reference to the "*provision of guidance*" in order to avoid expectations of unrealistic procedures and unnecessary burden for RRMs/IIPs. |

| | (b) transmit to the IIP client a copy of the IIP client's inside information reports as submitted to the Agency.

4. By way of derogation from Article 12(3), for the purposes of ensuring timely and efficient disclosure of information, the IIP may publish and submit inaccurate or incomplete inside information reports to the Agency, provided that the content in the reports is relevant for market participants' trading choices. In such cases, the inaccurate or incomplete information in the report shall be flagged by the IIP upon the publication and submission of the report to the Agency. In case the information needs to be corrected, IIPs shall collaborate with their IIP clients to correct it. Once the information is corrected, IIPs shall publish it and resubmit it to the Agency as soon as it is technically possible. | ~~4. By way of derogation from Article 12(3), for the purposes of ensuring timely and efficient disclosure of information, the IIP may publish and submit inaccurate or incomplete inside information reports to the Agency, provided that the content in the reports is relevant for market participants' trading choices. In such cases, the inaccurate or incomplete information in the report shall be flagged by the IIP upon the publication and submission of the report to the Agency. In case the information needs to be corrected, IIPs shall collaborate with their IIP clients to correct it. Once the information is corrected, IIPs shall publish it and resubmit it to the Agency as soon as it is technically possible.~~ | |

Article 26 (Assessment of data records before submission)	The RRMs' data validation systems referred to in Article 12 shall: (a) detect whether the data record contains all the required information as set out in [Commission Implementing Regulation (EU) No 1348/2014] and in the related manuals adopted by the Agency; (b) detect any data corruption that the RRM might have caused while processing the data record; (c) enable the authentication of the source of information and verify the following: (i) the identity of the RRM client; (ii) the identity of any other person submitting information on behalf of the RRM client; (iii) that persons submitting information on behalf of a RRM client are properly authorised to do so. Where an RRM and its clients belong to the same legal entity, the RRM does not need to comply with the obligation set out in point (c).	The RRMs' data validation systems referred to in Article 12 shall: (a) detect whether the data record contains all the required information as set out in [Commission Implementing Regulation (EU) No 1348/2014] and in the related manuals adopted by the Agency **and in the Guidelines developed by the Agency pursuant to Article XXX of this Regulation;";** (b) detect any data corruption that the RRM might have caused while processing the data record; (c) enable the authentication of the source of information and verify the following: (i) the identity of the RRM client; (ii) the identity of any other person submitting information on behalf of the RRM client; ~~(iii) that persons submitting information on behalf of a RRM client are properly authorised to do so.~~ Where an RRM and its clients belong to the same legal entity, the RRM does not need to comply with the obligation set out in point (c).	Regarding the subparagraph a) we believe it would be preferable for the Agency not to impose a standardized functionality to check if data record is compliant with the data format, as individual RRMs are better positioned to develop similar solutions, that would be tailored to their reporting systems, ensuring greater compatibility and efficiency. Applying a centrally imposed functionality may lead to overlap with the solution already in use by ACER and is likely to slow down both the reporting process and the time required to treat and analyze the data. While the implementing period for Art 26 is 12 months after entry force, but the guidance on data validation is to be provided within 7 months after entry into force, this would give our members only 5 months for implementation in worst case. Lastly, there are surely several use cases, where the RRM is purely not able to implement ACER's validation checks in their system, as we do not have insight into ACER's database & their validation rules. E.g. The ACER Code change or the EIC Code change are examples, where the RRM is lacking the most accurate & most updated information to apply this validation check.
Article 27 (Detection and correction of invalid data records before submission to the Agency)	1. Where data validation systems detect or identify any data inconsistencies or missing data ('invalid data') prior to the reporting of data records to the Agency, RRM shall provide their RRM clients with detailed information regarding the	1. Where data validation systems detect or identify any data inconsistencies or missing data ('invalid data') prior to the reporting of data records to the Agency, RRM shall provide their RRM clients, **where applicable** ,with detailed information regarding the validation results and shall request their RRM clients, **where applicable** ,to resubmit	**Regarding paragraph 1:** There is an inconsistency in the first paragraph, as the validation shall be done Prior to the submission of the information to the Agency, the resubmission to the agency is only relevant if the inconsistencies or invalid data are discovered after the initial submission.

validation results and shall request their RRM clients to resubmit the data records to the RRM with the necessary corrections or missing data. When receiving that information from the clients, the RRM shall resubmit those records to the Agency as soon as technically possible.
Where the RRM and its clients belong to the same legal entity, the RRM shall resubmit the data records to the Agency with the necessary corrections or missing data as soon as technically possible in cases where data validation systems detect or identify any invalid data prior to the reporting of data records to the Agency.

2. RRMs shall maintain a register of data records containing invalid data submitted by their RRM clients. That register shall include information on whether the RRM clients have successfully submitted the corrected data records. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which RRM clients submitted invalid data as well as the identity of such clients.
Where an RRM and its clients belong to the same legal entity, the RRM shall maintain a register of

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the data records to the RRM with the necessary corrections or missing data, **unless the client and the RRM are the same legal entity**. When receiving that information from the clients, the RRM shall ~~re~~submit those records to the Agency as soon as technically possible, **regardless of the timing of transaction reporting pursuant to Article 10 of the REMIT Implementing Regulation, as the case may be**.
Where the RRM and its clients belong to the same legal entity, **and to the extent the information is available to them,** the RRM shall ~~re~~submit the data records to the Agency with the necessary corrections or missing data as soon as technically possible in cases where data validation systems detect or identify any invalid data prior to the reporting of data records to the Agency.

~~2. RRMs shall maintain a register of data records containing invalid data submitted by their RRM clients. That register shall include information on whether the RRM clients have successfully submitted the corrected data records. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which RRM clients submitted invalid data as well as the identity of such clients.~~
~~Where an RRM and its clients belong to the same legal entity, the RRM shall maintain a register of data records containing invalid data. That register shall include information on whether the RRM has successfully submitted the corrected data records to the Agency. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which RRM clients submitted invalid data as well as the identity of such clients.~~

Moreover, we have concerns regarding the provisions on detection and correction of invalid data before submission to the Agency. The timeframe prescribed for transaction reporting of two working days is too narrow to serve as a suitable basis for the timeframe required for data correction, especially in the reporting of trade-matching system data. Given the involvement of multiple stakeholders, including a RRM, its clients, and possibly external service providers, the correction process necessitates effective communication, coordination to correct invalid data, and subsequent submission of accurate information. In some instances, this might even further require the initiation of a formal change request from a service provider.

In addition, regarding subparagraph 2, in some cases, OMPs will not be able to generate themselves the reportable information and detect the errors. Market participants will need to provide this exogenous information to their OMPs. The proposed amendment aims to address this issue.

Regarding paragraph 2:
We are concerned about the proposed requirement for RRMs to maintain a register of invalid records, including whether clients have subsequently submitted corrected data. While we understand the intention to monitor uncorrected or unreported transactions, the requirement is technically complex, operationally burdensome, and inconsistent with the principle of proportionality.

Establishing such a register would require RRMs to build sophisticated systems capable of storing, indexing, and matching rejected records with later client submissions. This imposes a significant financial and operational burden, particularly as IIPs are service providers - not entities responsible for supervising client compliance.

To effectively match corrected data with rejected submissions, RRMs would need to store all invalid data and implement

	data records containing invalid data. That register shall include information on whether the RRM has successfully submitted the corrected data records to the Agency. The Agency may access the register and may notify the relevant national regulatory authorities of instances in which RRM clients submitted invalid data as well as the identity of such clients.		tracking mechanisms. However, this is complex and problematic because: • Corrected data records are modified and do not always include a static or unique identifier to provide link with the original message; • Rectified messages can be submitted in entirely separate batches, with no technical reference to the original rejected data, making correlation difficult. It is important to highlight the distinction between data processing by Third-party RRMs (service providers) and Self-reporting RRMs. In the case of Self-reporting RRMs, the entity generating the data is also the reporting party. This means that data generation, validation, and any necessary rectification are handled internally as part of an integrated process. As a result, invalid records are identified and corrected before submission and do not reach the RRM interface. Consequently, there are no rejected records to be tracked or registered in a potential log of invalid submissions. This stands in contrast to Third-party RRMs, where the data originator and the reporting entity are separate, requiring external validation. Potential obligation for the tracking and registering of invalid records must acknowledge the structural differences between Self-reporting and Third-party RRMs. A uniform requirement would introduce unnecessary complexity and cost for Self-reporting RRMs, without delivering any added value in terms of data quality or transparency. As a result, introducing a register of invalid submissions would lead to unequal treatment between Self-reporting and Third-party RRMs, undermining the principle of non-discrimination. A potential solution involving the tracking and registration of invalid records would be highly complex and costly to

| | | | implement, running counter to the principles of regulatory simplification and proportionality.

Finally, RRMs are not enforcement bodies and cannot be tasked with monitoring or ensuring client compliance.

We therefore recommend that the obligation to maintain a register of invalid records be removed both for the Self-reporting and Third-party RRMs. Instead, regulatory focus should be directed toward increasing awareness among market participants and improving overall compliance, rather than introducing technically disproportionate requirements for RRMs. |

| Art 28 (Data reconciliation) | [...].

3. RRMs shall request that the organised market place provide the missing corresponding data records from the other party to the transaction. | [...]

3. RRMs shall request that the organised market place provide the missing corresponding data records from the other party to the transaction.
4.In case the client and the RRM are the same legal entity, the provisions of this Article will not apply.” | |

| Article 29 (Receipt of data records submitted by RRMs) | 1. The Agency shall issue receipts of reported data records to RRMs. Those receipts shall include at least the following information:

(a) the identification of the reported data record;

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

In case the data record has not successfully been collected by the Agency due to an error, the receipt shall also indicate the data | 1. The Agency shall issue **immediately** receipts of reported data records to RRMs. Those receipts shall include at least the following information:
(a) the identification of the reported data record;
(b) an indication of whether the data record has been successfully collected by the Agency.
(c) compliance of the reported data with the validation rules of the Agency.

2. In case the error referred to in paragraph 1, second subparagraph, is attributable to the RRM, the RRM shall resubmit the corrected data record to the Agency within ~~two working days~~ **20 working days.**

If the error is attributable to the RRM clients, the RRMs shall provide them with ~~guidance on how to correct the~~ *ACER's receipt for the relevant* data record and | **Regarding paragraph 1:**
To support timely data rectification, the RRM may implement an automated solution to notify the client of the Agency's receipt. However, including the full report file in this automated exchange would be highly resource-intensive. Alternatively, report and receipt files can be made accessible to clients through other channels, such as their profile within the RRM's system.

Regarding subparagraph 1 of paragraph 2
The currently foreseen deadline of two days is unreasonable since it does not take into account the time required to identify the root cause of an error and the solution to correct it. One should note that the great majority of the errors are functional and not technical. Therefore, data validation systems that would help detect technical errors, pursuant to article 26 (a), |

	affected by the error and, if possible, the cause of the error. 2. In case the error referred to in paragraph 1, second subparagraph, is attributable to the RRM, the RRM shall resubmit the corrected data record to the Agency within two working days. If the error is attributable to the RRM clients, the RRMs shall provide them with guidance on how to correct the data record, and subsequently submit the corrected data record to the Agency within five working days. 3. RRMs shall implement automated alert systems that are capable of performing the following actions: (a) notify the RRM clients of the Agency's receipt; (b) transmit to the RRM client a copy of the RRM client's data records as reported to the Agency. 4. The copy of the RRM client's data record and the Agency's receipts related to LNG market data shall be made available to the RRM client as soon as possible after it is received from the Agency. 5. RRMs shall act as single points of contact between the Agency and their RRM clients by establishing communication channels with	subsequently submit the corrected data record to the Agency within ~~five~~ **20** working days~~.~~ **, following its successful acceptance and validation in the RRM's system.** 3. RRMs shall implement automated alert systems that are capable ~~of performing the following actions:~~ ~~(a)~~ to notify the RRM clients of the Agency's receipt;~~.~~ ~~(b) transmit~~ **RRMs shall make available** to the RRM client a copy of the RRM client's data records as reported to the Agency **and Agency's receipt.** **[...]** 7. RRMs that do not have clients**, as defined in Article 2 (4),** and report data records to the Agency solely on their own behalf shall not be required to comply with paragraphs 3, 4 and 5 **and 6**.	may not adequately address the root causes of operational errors and significantly mitigate their occurrence. As a consequence, we recommend extending the period to resubmit the corrected record to the Agency to twenty working days instead of two working days, as proposed in the draft. **Regarding subparagraph 2 of paragraph 2**, the currently foreseen deadline of five working days to resubmit the corrected data record is too short, in particular regarding the reporting of trade-matching system data. Given the involvement of multiple stakeholders, including a RRM, its clients, and possibly external service providers, the correction process necessitates coordinated communication, coordination, and subsequent submission of accurate information. In some instances, this might even further require the initiation of a formal change request from a service provider. We suggest extending the current deadline to 20 working days.

	their RRM clients and shall ensure that the RRM clients are informed of any non-compliance or missing data. 6. By way of derogation from paragraph 5, the Agency may directly contact the RRM clients in case clarifications and corrections are needed with regard to reported LNG market data. 7. RRMs that do not have clients and report data records to the Agency solely on their own behalf shall not be required to comply with paragraphs 3, 4 and 5.		
Article 30 (Compliance monitoring and assessment)	Upon request by the Agency, IIPs and RRMs shall provide, within the timeframe indicated by the Agency, information necessary for the assessment of their continued compliance with this Regulation and with Regulation (EU) No 1227/2011. The Agency may also request information regarding the IIP client or RRM client on whose behalf the IIP or the RRM is reporting. In such case, the IIP or RRM shall liaise with the relevant IIP client or RRM client to the extent necessary to obtain the requested information.	Upon request **and clear specification** by the Agency, IIPs and RRMs shall provide information necessary for the assessment of their continued compliance with this Regulation and with Regulation (EU) No 1227/2011 **within a reasonable and relevant to the requested information timeframe, indicated by the Agency.** The Agency may also request information regarding the IIP client or RRM client on whose behalf the IIP or the RRM is reporting. In such case, the IIP or RRM shall liaise with the relevant IIP client or RRM client to the extent necessary to obtain the requested information.	The time required for submitting the information should be proportionate to the extent of the required information.

| Article 31 Material changes after authorisation | (1) When IIPs or RRMs or their IIP clients or RRM clients initiate any material changes as referred to in Article 6(3), the IIPs or RRMs shall notify the Agency of such changes no later than five working days after the change has taken place. The notification shall describe the change in detail and be accompanied by the relevant supporting documents as referred to in Article 4.

(2) RRMs shall also notify the Agency of any changes to the reported volumes, prior to their implementation. | (1) When IIPs or RRMs or their IIP clients or RRM clients initiate any material changes as referred to in Article 6(3), the IIPs or RRMs shall notify the Agency of such changes no later than ~~five~~ **10** working days after the change has taken place. The notification shall describe, **where applicable**, the change in detail and be accompanied by the relevant supporting documents as referred to in Article 4.

(2) RRMs shall also notify the Agency of any changes that have a significant impact on to the reported volumes, prior to their implementation., **where such changes are known to the RRM and fall within its operational control.** | **Regarding Paragraph 1**
We propose extending the timeframe from 5 to 10 working days in order to ensure sufficient time for proper assessment, processing, and implementation.

If the manner of data submission is changed, the supporting attestation documentation should not be revised.

Regarding Paragraph 2
In the second paragraph, we propose that the RRM's reporting obligation should apply exclusively to changes that have a significant impact on the volume of reported data, as fluctuations in reported data may occur very frequently due to entry of a new market participant, various routine operational factors or seasonal variations.

The RRM may not be aware in advance about the changes in client's submission profile. |
| Article 33 (Compliance monitoring and assessment) | [...]

2. The annual report shall provide the following information for the reference year:

(a) the number of invalid data records that were not submitted to the Agency, including the identity of the relevant market participants;

(b) the number of instances of invalid data records for which the RRM followed up with their respective RRM clients in order to correct the data record in accordance with Article 27;

(c) in case of bilateral trades, the list of market participants who are not RRM clients, but who are the | 2. The annual report shall provide the following information for the reference year:

~~(a) the number of invalid data records that were not submitted to the Agency, including the identity of the relevant market participants;~~

~~(b) the number of instances of invalid data records for which the RRM followed up with their respective RRM clients in order to correct the data record in accordance with Article 27;~~

Information about the registered contingency reports by the RRM with ACER;

(~~c~~b) in case of bilateral trades, the list of market participants who are not RRM clients, but who are the counterparties of RRM clients in the respective bilateral trades. | As detailed in our justification for the proposed amendment to Article 27(2), we have strong reservations about the requirement for RRMs to establish and maintain a register of invalid records. We recommend that this obligation be removed for both Self-reporting and Third-party RRMs.

Accordingly, we also oppose the inclusion of such information in the annual RRM report to ACER.

As a more practical and proportionate alternative, we suggest that the annual report focus on the contingency reports submitted by the RRM to ACER during the reference year, which would offer valuable insight without introducing undue complexity or cost. |

	counterparties of RRM clients in the respective bilateral trades. [...]		
Article 33 Annual reporting by RRMs	(4) The Agency may request RRMs to amend their annual report, in case it does not include all the elements set out in this Article. Such request shall specify the missing information or the clarifications that the Agency needs based on the submitted information. The RRM shall amend the annual report accordingly and resubmit it within 15 working days from the receipt of the request.	(4)The Agency may request RRMs to amend their annual report, in case it does not include all the elements set out in this Article. Such request shall specify the missing information or the clarifications that the Agency needs based on the submitted information. The RRM shall amend the annual report accordingly and resubmit it within ~~15~~ **30** working days from the receipt of the request.	We kindly propose extending the timeframe from 15 to 30 working days in order to ensure sufficient time for proper assessment, processing, and implementation of the required actions

Article 38 (Procedure for the orderly substitution)	1. No later than two working days following the notification of a withdrawal decision, the IIP or RRM whose authorisation has been withdrawn (the 'withdrawing IIP or RRM') shall inform its IIP clients or RRM clients, in writing, of the arrangements and procedures to be followed for the transfer of relevant data and the redirection of reporting flows to an alternative IIP or RRM chosen by the IIP client or the RRM client. In the same communication, the withdrawing IIP or RRM shall request the relevant IIP clients or RRM clients to indicate their selected IIP or RRM for the purpose of ensuring orderly substitution (the 'selected IIP or RRM').	1. No later than two working days following the notification of a withdrawal decision, the IIP or RRM whose authorisation has been withdrawn (the 'withdrawing IIP or RRM') shall inform its IIP clients or RRM clients, in writing, of the arrangements and procedures to be followed for the transfer of relevant data **and the redirection of reporting flows to an alternative IIP or RRM chosen by the IIP client or the RRM client**. In the same communication, the withdrawing IIP or RRM shall request the relevant IIP clients or RRM clients to indicate their selected IIP or RRM for the purpose of ensuring orderly substitution (the 'selected IIP or RRM').	We consider the most optimal solution to organise the orderly substitution and replacement of the withdrawn RRM/IIP via data transfer between the RRM/IIP with withdrawn authorisation and the respective clients (MPs/OMPs). Since the clients have a channel for exchange with the withdrawn RRM/IIP, this data transfer could be performed without burden and additional costs for both sides. Furthermore, the clients are the source of the reportable data and only the clients are in a position to initiate and supplement the reporting, including of LCE, via the newly selected RRM/IIP. Setting-up ad-hoc solutions for data transfer between withdrawn and active RRMs/IIPs would be complex and expensive.
	2. In the request referred to in paragraph 1, the withdrawing IIP or RRM shall ask for the following details: (a) the legal name of the entity of the selected IIP or RRM;	2. In the request referred to in paragraph 1, the withdrawing IIP or RRM shall ask for the following details: (a) the legal name of the entity of the selected IIP or RRM;	Considering the inevitable involvement of the clients in the data transfer and substitution process, we do not see added value form transferring the historically reported data between the withdrawn RRM/IIP and a multitude of active RRMs/IIPs. Furthermore, it is not feasible to select a new RRM/IIP within 20 working days/1 month. To select and establish contractual/technical relations with a new RRM/IIP minimum 3-6 months would be needed.
	(b) the legal registered address of the selected IIP or RRM;	(b) the legal registered address of the selected IIP or RRM;	Moreover, the purpose of the data transfer from the withdrawn RRM/IIP to the active RRM/IIP is not clear considering that the same data has been reported to ACER and is available at ACER and NRAs.
	(c) the contact details of the selected IIP or RRM.	(c) the contact details of the selected IIP or RRM.	Such data transfer between the withdrawn RRM/IIP and the active RRM/IIP is effectively equivalent to the dissemination of commercially sensitive data to parties not involved and not concerned by the relevant transactions. In this regard, we consider that the orderly substitution should happen through data transfer between the RRM/IIP with withdrawn authorisation and the respective clients (MPs/OMPs). Additionally, storing and transferring data for multitude of clients for a period of 5 years would significantly increase the expenses of the reporting parties.
	3. The selected IIP or RRM shall start the relevant services for the relevant IIP client or RRM	3. The selected IIP or RRM shall start the relevant services for the relevant IIP client or RRM client at the latest the working day following the termination of the period for the orderly substitution, as established by the Agency's decision, provided that the IIP client or the RRM client has signed the service agreement for the relevant IIP or RRM services.	Finally, self-reporting OMPs/MPs will not disappear from the market after the withdrawal of the IIP/RRM role. There is no real benefit in transferring their historically reported data to a third party when the MP/OMP will continue to operate in the energy market and will be able to store the historical data until the end of its retention period and make it available to ACER and the NRAs as needed. Furthermore, the revision of the IR obliges the MPs and OMPs to store details of reported data for a period of 5 years.
		4. The withdrawing IIP or RRM shall obtain from the relevant IIP client or RRM client the information of the selected IIP or RRM in written form within **three** ~~one~~ month**s** from the notification mentioned in paragraph 1. If the relevant IIP client or RRM client fails to do so, the Agency shall notify the national regulatory authority of the Member State where the IIP client or RRM client is registered. The notified national	

client at the latest the working day following the termination of the period for the orderly substitution, as established by the Agency's decision, provided that the IIP client or the RRM client has signed the service agreement for the relevant IIP or RRM services.

4. The withdrawing IIP or RRM shall obtain from the relevant IIP client or RRM client the information of the selected IIP or RRM in written form within one month from the notification mentioned in paragraph 1. If the relevant IIP client or RRM client fails to do so, the Agency shall notify the national regulatory authority of the Member State where the IIP client or RRM client is registered. The notified national regulatory authority shall assess the need for possible enforcement action.

5. After the period for the orderly substitution established by the Agency has expired, the withdrawing IIP or RRM shall notify the Agency, without undue delay, of the selection made by each of their IIP clients or RRM clients. That notification shall also indicate the exact date on which the withdrawing IIP or RRM notified the relevant IIP client or RRM client in accordance with paragraph 1,

regulatory authority shall assess the need for possible enforcement action.

5. After the period for the orderly substitution established by the Agency has expired, the withdrawing IIP or RRM shall notify the Agency, without undue delay, of the selection made by each of their IIP clients or RRM clients. That notification shall also indicate the exact date on which the withdrawing IIP or RRM notified the relevant IIP client or RRM client in accordance with paragraph 1, as well as the date on which the information of the selected IIP or RRM was received by the withdrawing IIP or RRM.

6. During the period for the orderly substitution established by the Agency, the withdrawing IIP or RRM shall transfer to the ~~selected IIP or RRM the following respective clients~~:

(a) the details of data records or inside information reports, as applicable, that have been reported or submitted to the Agency after the date of the adoption of the withdrawal decision;

(b) for the withdrawing IIP, the details of inside information reports submitted to the Agency ~~five~~ **two** years prior to such date, and for the withdrawing RRM, the details of data records reported to the Agency ~~five~~ **two** years prior to the date of adoption of the withdrawal decision;

(c) any other information relevant to the transfer of the withdrawing IIP's or RRM's services to the selected IIP or RRM.

7. The withdrawing IIP or RRM shall provide its IIP clients or RRM clients, upon their request, with any additional information or clarifications with respect to the transfers referred to in paragraph 1.

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

as well as the date on which the information of the selected IIP or RRM was received by the withdrawing IIP or RRM.

6. During the period for the orderly substitution established by the Agency, the withdrawing IIP or RRM shall transfer to the selected IIP or RRM the following:

(a) the details of data records or inside information reports, as applicable, that have been reported or submitted to the Agency after the date of the adoption of the withdrawal decision;

(b) for the withdrawing IIP, the details of inside information reports submitted to the Agency five years prior to such date, and for the withdrawing RRM, the details of data records reported to the Agency five years prior to the date of adoption of the withdrawal decision;

(c) any other information relevant to the transfer of the withdrawing IIP's or RRM's services to the selected IIP or RRM.

7. The withdrawing IIP or RRM shall provide its IIP clients or RRM clients, upon their request, with any additional information or clarifications with respect to

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

A withdrawing RRM which is also a market participants, should store the data, subject to Paragraph 6, for a period of 5 years.

	the transfers referred to in paragraph 1. 8. A withdrawing RRM which is reporting data records on its own behalf shall inform the Agency, in writing and within one month from the receipt of the withdrawal decision, about its selected RRM for the purpose of ensuring orderly substitution. The notification shall include the information referred to in paragraph 2. Paragraphs 3, 5 and 6 of this Article shall apply *mutatis mutandis*.		
Article 40 (Entry into force and application)	This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union. Articles 3 to 8 and 10 to 39 shall apply from [*OP: please insert the date = 12 months after the date of entry into force of this Regulation*]. This Regulation shall be binding in its entirety and directly applicable in all Member States.	This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union. Articles 3 to 8 and 10 to 39 shall apply from [~~*OP: please insert the date = 18*~~*2 months after the date of entry into force of this Regulation*]. This Regulation shall be binding in its entirety and directly applicable in all Member States	We propose 18 months after the date of entry into force of this Regulation also given that the extra time needed to Acer for publication of VRs (seven months after the date of entry into force of the regulation). As the guidance by ACER can take up to 7 months after entry into force, this minimises the implementation period for several Articles, as we need to deduct the months ACER is taking up for providing the guidance. the implementation deadline and guidance publication shorten the deadline for RRMs. The implementation of the new Delegated Regulation — including both operational readiness and the authorization process — cannot meaningfully begin without the publication of the technical specifications listed under Article 9 of the Delegated Regulation. These documents are not minor clarifications - they form the essential foundation for the entire reporting infrastructure. Key items such as the technical process for testing (Article 9(a)), data validation principles and processes (9(c)), security requirements (9(d)), contingency report formats (9(e)), completeness and error-checking mechanisms (9(g)), and the annual report format (9(h)) define how RRMs, IIPs, and market participants must operate. These specifications directly affect the development, testing, and deployment of compliant systems.

			Moreover, the attestation documentation required for authorization must reflect actual technical capabilities based on integrated, functioning solutions — which cannot be developed / adjusted in the absence of final specifications. As a result, the authorization process itself cannot be properly initiated until these details under Article 9 are clearly and formally defined.
			Beginning implementation or authorization without this firm technical foundation would expose RRMs and IIPs to uncertainty, operational inefficiencies, and disproportionate compliance burdens.
			Therefore, the formal application of the new requirements — including authorization procedures — should commence only from the date of publication of the technical specifications and supporting documentation under Article 9.
			Setting the implementation timeline to begin only after the publication of the specifications, while allowing adequate time for the preparation and publication of the documents listed in Article 9, and ensuring sufficient time for RRMs and IIPs to carry out the necessary technical developments, is crucial for a smooth, fair, and sound implementation of the Delegated Regulation.

| Annex II – Table

Urgent market messages: Curve type, Resolution, Position | Urgent market messages: Curve type, Resolution, Position | Removal of the three fields

~~Curve type, Resolution, Position~~ | **See for further justification the Annex at the bottom of this document**

We strongly support the deletion of the proposed "Curve Type" field. The inclusion of this field is widely viewed as unnecessary and counterproductive. As noted by ACER, the majority of stakeholders in the public consultation did not endorse this proposal. They expressed concerns that it would complicate disclosures, increase the risk of errors, and delay implementation due to added complexity.

The introduction of a third Curve Type UMM schema type poses a significant threat to data quality without delivering any added informational value. During the transition phase, MPs and IIPs would need to maintain three formats:

• UMM without intervals

• UMM with intervals

• UMM with curve type

This multiplicity increases the likelihood of format transformation errors, especially in frequently updated schedule UMMs. For example, converting a UMM with intervals into a curve type format is error-prone and raises accountability questions:
Who is responsible for the transformation? Who bears the consequences of errors?

Maintaining software compatibility for all three formats during the transition period is burdensome for both MPs and IIPs.

The Curve Type format is significantly more complex for market participants to interpret and use:

Example 1: A Curve Type UMM (e.g., from ENTSO-E) may span hundreds of pages, requiring users to manually calculate time points and interpret resolution data. (see Figure 1 in Annex) |

			Example 2: A UMM with Intervals (e.g., from EEX) presents only the changed intervals on a single page, offering a clear and concise view of capacity fluctuations. (see Figure 2 and 3 in Annex) Additionally, the XML structure of Curve Type messages is more intricate, requiring users to calculate time points (e.g., Position 32 based on start time), whereas Intervals provide direct time references. This increases the risk of data entry errors and reduces usability. Intervals also offer greater flexibility, as there is no need to specify resolution or use multiple intervals with varying resolutions. Finally, the last REMIT update introduced Intervals, which already required significant changes across the market: Affected at least 14 IIPs and 19,400+ market participants Required updates to platform processing, website disclosure, and data forwarding systems The proposed Curve Type field would impose additional burdens without clear benefits. The public consultation clearly indicated that stakeholders are against this change.

Annex II Reportable details of inside information: Curve type	Reportable details of inside information *24. The field indicates the type of the curve that is being provided for intervals in question, such as variable sized block or fixed sized block or point.*	Deletion of [this] field: 24. Curve type: The field indicates the type of the curve that is being provided for intervals in question, such as variable sized block or fixed sized block or point.	We strongly support the deletion of this field

ANNEX:

CURVE TYPE – additional reasoning
Justification:

There has been considerable concern among stakeholders regarding the proposed addition of "Curve type" elements - namely Curve type, Resolution, and Position - to the UMM formats.

Feedback from the 2024 public consultation, as summarized in ACER's Evaluation Report, shows that most respondents are opposed to this change. They argue that it would overly complicate the disclosure process, elevate the risk of errors and inconsistencies, and potentially delay disclosures. The technical effort required to implement these changes would be substantial for both IIPs and Market Participants.

When it comes to unplanned events, forecasting their progression or accurately defining a "Curve type" is often impractical or impossible.

The information conveyed by the "Curve type" fields overlaps with data already provided through the existing "Unavailability Intervals" within the UMMs. The "Unavailability Intervals" effectively capture energy variations throughout the event, making the "Curve type" additions redundant and resulting in unnecessary duplication of data publication and reporting.

It should also be noted that the recent implementation of the "Unavailability Intervals" involved considerable modifications and investment by IIP platforms and MPs. Introducing further amendments now would force 22 IIPs and over 19000 MPs to modify their systems again shortly after adapting to the recent changes, raising concerns about the overall cost-effectiveness and necessity of this proposal.

In this context, adding the "Curve type" data elements to the UMM format will lead to significant additional costs and operational demands for MPs and IIPs, without clear benefits for market operation or surveillance. Increased complexity, associated with a higher chance of publication errors and delays, runs counter to objectives of data quality improvement and streamlined reporting processes. It is questionable whether such data, if inconsistent or erroneous, would genuinely aid surveillance activities. Above all, inside information disclosure must remain straightforward, clear, and user-friendly.

For these reasons, we recommend preserving the existing UMM format and refraining from introducing additional elements such as Curve type, Resolution, and Position that would complicate and disrupt the current process.
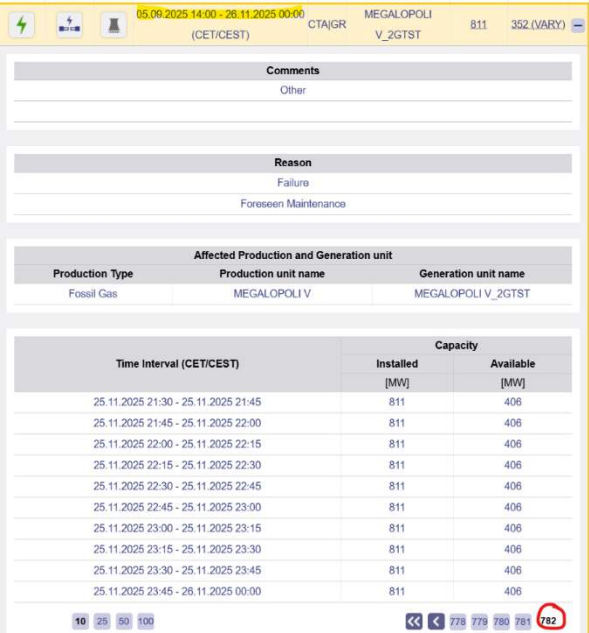
EXAMPLES:

EXAMPLE 1:

Figure 1. ENTSO-E Curve Type

EXAMPLE 2:

Figure 2. Curved type increase the complexity of the XML structure and requires to calculate the time point based on the Interval and to set a resolution. E.g. You don't know right away which time point is position 32.

Figure 3. Intervals are more flexible because you have not to specify the resolution and calculate the position. This will reduce the probability of errors.

EXAMPLE 3:

SCENARIO

Event: Planned maintenance
Asset Type: Electricity generation unit
Total capacity: 100 MW
Start of Unavailability: 01 Jan 2025, 00:00

End of Unavailability: 01 Jan 2025, 03:00
Outage Profile: Gradual ramp-down and ramp-up over the outage period.

1. UNAVAILABILITY INTERVALS representation

Interval Start Data Field 25	Interval End Data Field 26	Available Capacity (MW) Data Field 11
01 Jan 2025 00:00	01 Jan 2025 01:00	75
01 Jan 2025 01:00	01 Jan 2025 02:00	50
01 Jan 2025 02:00	01 Jan 2025 03:00	75

This format fully captures the evolution of the outage in terms of how capacity changes over time.

2. CURVE TYPE representation

Field	Value	Meaning
Curve Type Data Field 24	A01	Identification of the coded representation of the type of curve being described - Type of the curve that is being provided for the time series in question, e.g. variable sized block or fixed sized block or point.
Resolution (1st interval) Data field 27	60 min	The number of units of time that compose an individual step within a period.
Position (1st interval) Data field 28	1	A sequential value representing the relative position within a given time interval.
Resolution (2nd interval) Data field 27	60 min	The number of units of time that compose an individual step within a period.
Position (2nd interval) Data field 28	2	A sequential value representing the relative position within a given time interval.
Resolution (3rd interval) Data field 27	60 min	The number of units of time that compose an individual step within a period.
Position (3rd interval)	3	A sequential value representing the relative position within a given time interval.

Field	Value	Meaning
Data field 28		

3. UMM sample

Data Field	Parameter	Value	Comment
1	Message ID		
2	Event Status		
3	Type of information		
4	Type of Unavailability		
5	Type of Event		
6	Publication date/time		
7	Event Start	20250101, 00:00	*Duration of the whole event (event period)*
8	Event Stop	20250101, 03:00	
9	Unit of measurement	MW	
12	Installed capacity	100	
14	Reason for the unavailability	Planned maintenance	
15	Remarks		
16	Fuel Type		
17	Bidding Zone		
18	Affected Asset or Unit		
19	Affected Asset or Unit EIC code		
20	Market Participant		
21	Market Participant Code		
22	IIP ID		
23	Direction		
25	Interval Start	20250101, 00:00	*Duration of the 1st subinterval*
26	Interval Stop	20250101, 01:00	

10	Unavailable Capacity	25	*Unavailable capacity during the 1st subinterval*
11	Available Capacity	75	*Available capacity during the 1st subinterval*
27	Resolution	60 min	*Duration of the block 1*
28	Position	1	*Position of the 1st subinterval within the event period*
25	Interval Start	20250101, 01:00	*Duration of the 2nd subinterval*
26	Interval Stop	20250101, 02:00	
10	Unavailable Capacity	50	*Unavailable capacity during the 2nd subinterval*
11	Available Capacity	50	*Available capacity during the 2nd subinterval*
27	Resolution	60 min	*Duration of the block 2*
28	Position	2	*Position of the 2nd subinterval within the event period*
25	Interval Start	20250101, 02:00	*Duration of the 3rd subinterval*
26	Interval Stop	20250101, 03:00	
10	Unavailable Capacity	25	*Unavailable capacity during the 3rd subinterval*
11	Available Capacity	75	*Available capacity during the 3rdt subinterval*
27	Resolution	60 min	*Duration of the block 3*
28	Position	3	*Position of the 3rd subinterval within the event period*
24	Curve type	A01	*Sequential fixed-size blocks (subintervals)*

SUMMARY

"Curve type" data set (Curve type, Resolution, Position) does not add new information but duplicates the content already reported through "Unavailability Intervals."

Information content	Curve Type	Unavailability Intervals	Is there duplication in place of the content brough by the Curve type and Unavailability Intervals

Energy profile	Uses coded values to present the energy dynamics (A01, A02, etc.)	Uses clear numeric value about the start and end time and date of each period	V
Duration	Duration of the individual blocks - presented as number of units of time	Duration of the individual blocks – provided though the exact start and end date and time of the subintervals	V
Chronology	Shows the sequence/order of the block/subinterval within the whole event period	Shows the sequence/order of the block through the exact start and end date and time of the subintervals	V

The example shows that both methods convey identical information in terms of timing and quantity. However, representing data through "Unavailability Intervals" offers a clearer and more precise numeric data about the energy dynamics throughout the observed period with details on the chronology. From a market participant's perspective, this approach is also easier to publish and interpret.

The "Curve Type" data set does not add new information compared to what is already contained in the "Unavailability Intervals" data set. Instead, the representation includes coded values and repeats information about the duration and order of the individual blocks. This is linked to unnecessary complexity, both in terms of defining the parameters, publishing and interpreting them accurately.