



GMM-VO, Begutachtungsentwurf

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1 Attachment



ECmailreport.html

Dear Sir or Madam,

regarding the Draft amendment of the Gas Market Model Ordinance 2012 Baumgarten-Oberkappel Gasleitungsgesellschaft m.b.H. would like to make the following statement:

BOG generally welcomes the amendment of the Gas Market Model Ordinance 2012 proposed in the light of the first feedback after the start of the new market model. The clarification on the UIOLI application is particularly welcome considering the new splitting of roles between Network Users and Balance Groups. Nevertheless BOG has some remarks and would like to propose some minor amendments.

The respective sections in detail:

Ad § 11 (8) and (13):

BOG is in an advanced stage of the early implementation project for CAM. The goal of this project is to attain a positive effect for the shippers by selling two capacity products at a cross border point in a bundled auction, which ensures that the shipper has consistent capacities in each system, at one integrated auction price. The implementation of a single nomination according to **§ 11 (8), second sentence** would contradict this effort. Allowing a step by step approach with due market feedback

will ensure a swift development of early implementation tests, building on the already available tools (e.g. PRISMA capacity sales platform), and anticipate the lifting of the main issues addressed by CAM and CMP. BOG therefore proposes to delete the second sentence of § 11 (8).

The reference to this provision in § 11 (13) should be deleted accordingly.

Ad § 24:

Concerning the calculation of losses BOG would like to point out that unlike DSOs, TSOs have hourly metered quantities at all points and therefore can identify the metering differences at least on a monthly basis when calculating their heat balance. Moreover the variation of network usage from one year to another can be noticeable on the TSO level. BOG will therefore calculate the metering difference in a shorter term method according to § 24 (4) lit 3.

Ad § 26:

BOG considers appropriate the proposed adaption of § 26 because the modifications recognize that the TSOs have a pivotal role in the minimization of balancing costs for the whole system. By putting a share of their linepack variation available for the MAM and DAM the TSOs deliver a free service to the community although this incurs some costs (e.g. extra compression) and also increases the probability that their specific BG is unbalanced. BOG therefore welcomes the proposed adaption of § 26 exempting these BG of a structuring fee, as a simplifying measure to minimize unnecessary payments. Since the experience on this aspect of linepack utilization is still building up, BOG will update E-Control should other issues arise.

Freundliche Grüße / Kind regards

MMag. Anna Maria Gerstmayer
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