

Annex B

Suggestion to the draft amendment to the Gas Market Code – Chapter 2

Proposal: To include data exchange SSO/PSO at TSO level inclusive Biogas as follows:

Nr.	Datenaustausch (Unterscheidung Nominierung und Renominierung über Zeitpunkt)	Kurzbeschreibung	Counterparts		Zeitpunkte (D ist der Gastag, an dem phys. Fluss stattfindet)			Datenstruktur		Nachrichtenformate	
			von	an	Day- ahead Zyklus	Intra-day Zyklen	Sonstige Zeitpunkte	Struktur:	In Zeitraster:	EDIG@S	weitere
Nominierungsmanagement im FLN											
1a	Speicher- /Produktionsnominierung im FLN	BGV nominieren Ausspeicherungen/ Produktionseinspeisungen (Entry) bzw. Einspeicherungen (Exit), exkl. MOL-Mengen	BGV	SSO/PSO	Bis 14:00 an D-1	Mit mind. 2h Vorlaufzeit	-	Menge je Richtung, je BG, ggf. je vertraglichem Speicher- bzw. Produktionspunkt (Pool)	Stundenwerte	NOMINT	KISS-A
2a	Bestätigung der Speicher- /Produktionsnominierung im FLN	Bestätigungsnachricht für BGV	SSO/PSO	BGV	Bis 15:25 an D-1	Spätestens 1h25min nach voller Stunde nach Nachrichteneingang (Speicher- /Produktionsnominierung)	-	Menge je Richtung, je BG, ggf. je vertraglichem Speicher- bzw. Produktionspunkt (Pool)	Stundewerte	NOMRES	KISS-A
2b	Kapazitätsnominierung Speicher/Produzent im FLN	SSO/PSO nominieren den Gastransport	SSO/PSO	TSO	Bis 14:30 an D-1	Spätestens 30min nach voller Stunde nach Nachrichteneingang (Speicher- /Produktionsnominierung)	-	Menge je Richtung, je BG, ggf. je vertraglichem Speicher- bzw. Produktionspunkt (Pool)		NOMINT	KISS-A
2c	Bestätigung der Kapazitätsnominierung Speicher/Produzent in FLN	Bestätigungsnachricht für SSO/PSO	TSO	SSO/PSO	Bis 15:00 an D-1	Spätestens 1h nach voller Stunde nach Nachrichteneingang (Speicher- /Produktionsnominierung)	-	Menge je Richtung, je BG, ggf. je vertraglichem Speicher- bzw. Produktionspunkt		NOMRES	KISS-A

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								(Pool)			
2d	Informationsbereitstellung zu BG-Einkürzung Speicher	TSO informiert SSO auf Basis der vom MGM gelieferten Daten über die bestätigbaren BG-Allokationen, die sich im Fall einer Speicherkürzung ergeben	TSO	SSO	-	-	Im Einkürzungsfall, ab Bekanntwerden, jedoch spätestens 1h vor Wirksamkeit	Menge je BG, je Speicherpool			Noch zu spezifizieren

Justification of the proposal:

- a) Proposal introduces rules for data exchange for the storage facility at the transmission level;
- b) BGV is not empowered to nominate storage related exit point on the transmission level (§ 7 of GMMO-VO 2012 expressly excludes i. a. the application of nomination/renomination by BGV rules → SSO has to nominate);
- c) Market model recognizes two different kinds of entry/exit points - relevant entry/exit points for any third party (see Article 18(4) of the EU Regulation 715/2009) and other entry/exit points, access to which is limited to specific entities – DAM, SSO, producers. These two types have, based on the law, different rules, inter alia, for capacity allocation and utilization, capacity development and rules for duration of the relevant capacity contracts. Current document does not include data exchange among affected parties. Considering all relevant aspects of each entry/exit points group – booking ability, operational utilization etc. we propose to include data exchange details for the storage utilization at TSO level. It seems more consistent to apply the utilization rules of capacities by SSO connected to the distribution system;
- d) SSO does not have to be part of any BG as his utilization of the network is created only by existing connection to the network (Explanation to § 18 of GMMO-VO 2012);
- e) Current system in place is not very flexible, the data exchange process is customer- (BGV-) unfriendly, creates unreasonable duplicity, please see example.

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Example of the current system in place:

1. Total capacity booked by SSO at storage related point: 100 units. Prior to utilization of this point SSO has to allocate the total booked capacity to the BG.

Let's assume following booking situation of the storage facility:

SSO has 3 customers – 3 BG with following rights – BG A 30 units, BG B 40 units, BG C 30 units,

1.a) SSO allocates total booked capacity (100 units) via OCB (online capacity booking) of respective TSO to each balancing group as follows:

BG A – 30 units, BG B – 40 units, BG C - 30 units

1.b) Day 1.: nomination of BG A 50 units (30 + 20 units as a day-ahead rate), BG B 50 units (40 + 10 units as a day-ahead rate), total nomination 100 units (capacity booked by SSO is not exceeded)

Action of SSO: SSO has to reallocate via OCB of the TSO the capacities as follows: BG A 50 units, BG B 50 units, BG C 0 units

1.c) Day 2. nomination of BG A 50 units (30 + 20 units as a day-ahead rate), BG B 10 units, BG C 10 units, total nomination 70 units (capacity booked by SSO is not exceeded)

Action of SSO: SSO has to reallocate via OCB of the TSO the capacities as follows: BG A 50 units, BG B 10 units, BG C 10 units

2. Each Customer has to send 3 nominations for the flow to/from storage facility:
 - a) first to the SSO,
 - b) second to the TSO for the storage related exit point,
 - c) third either to the TSO for relevant point or operator of the VTP.

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