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**Amendment 2017 to the Gas Market Model Ordinance 2012
Comments by BP Gas Marketing Ltd**

Sehr geehrter Herr Painz,
sehr geehrte Herren Farmer und Krug,
sehr geehrte Damen und Herren,

BP appreciates the opportunity to comment on the draft capacity conversion mechanism as proposed in your consultation of the Amendment 2017 to the Gas Market Model Ordinance 2012 as per your website (www.e-control.at/recht/aktuelle-begutachtungsentwuerfe).

You have decided for an ex-post request procedure, which means that after a successful auctioning of bundled capacity the shipper can request to 'convert' previously booked single sided capacity into this bundle. We have recognised small differences to the recently published ENTSG document describing the standard capacity conversion model (https://www.entsog.eu/public/uploads/files/publications/CAM%20Network%20Code/2017/CAP0717-17_170724_ENTSG_Capacity%20Conversion%20Model.pdf) and would recommend that you change your proposed amendment accordingly:

- Notification period should be reduced to 3 working days and include an obligation to the TSO to confirm within also 3 working days.
- Further the ENTSG model does foresee a voluntary offer of the conversion service for daily and within-day capacity products, which we are missing in your draft.
- Different to most European systems, the Austrian gas market includes additional capacity types beyond firm or interruptible. As your draft amendment follows the ENTSG model in the wording of allowing this capacity conversion for firm capacity only, we would like to see clarification that quasi firm capacity as DZK is included in the model.

We would be happy to further discuss with you.

Mit freundlichen Grüßen,

Joachim Rahls
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