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**Gesendet:** Freitag, 25. Oktober 2019 20:55  
**An:** marktregeln  
**Cc:** СТРУКОВ Андрей Вадимович; МАЗИЛОВ Владимир Александрович  
**Betreff:** Consultation of Gas-Market-Model Ordinance 2020

Dear Sir or Madam,

Within the framework of ongoing consultation process on redesigning of Austrian gas balancing system, we welcome the opportunity to submit our position regarding proposed updates on the current balancing regime.

We would like to highlight our appreciation of the concept of preliminary usage of linepack flexibility as a way of balancing. From our point of view it serves as an example of effective, prudent and reliable operation of the grid.

But we would also like to raise some concerns:

We have noticed that the new draft of Gas Market Model Ordinance foresees the harmonization of balancing rules at transmission and distribution level. To our point of view such harmonization should not act as a formal ground for unreasonable redistribution and socialization of the costs between market players. The proposed concept could raise the costs of transit shippers and decrease the same cost for shippers who work on distribution level. This could be considered as some sort of discrimination that could make the Austrian gas transit system less competitive.

As far as we understood the mechanism of WDO fee application foresees some sort of flexibility only for shippers who work directly with the end-consumers. The absence of any tolerance for transit shippers could be considered as some sort of discrimination. From our point of view conditions of applications of such fee, which will work as an alternative to existing incentive mark-up mechanism, should undoubtedly consider meteorological conditions, technical limitations of the grid (incl. unplanned) and unpredictability of consumers' behavior as well. All mentioned reasons consequently should be taken into account as a base for application of corresponding tolerance for WDO. We consider it reasonable to provide such tolerance in the amount no less than 7,5% according to the existing business practice in Western Europe.

Talking about timeframes for the clearing periods we believe that for the benefit of all the parties involved and due to logical and objective reasons first clearing period should be for the information purposes only and not for the financial settlement between the parties to provide the opportunity to Balance Group Members to verify their balancing position and to correct possible technical or other mistakes. Final clearing phase should be prolonged (1,5 month after the end of month concerned as minimal time range imposed by business practice). All financial settlements should be finalized only after termination of both stages

of clearing procedure. Furthermore, provided timeframes are not in line with existing business practice in Western Europe. All procedures should provide easy way to adjust incorrect allocation data that frequently arises due to technical failures, that could even happen not due to the invoiced market players' actions. Also it is necessary to mention that any collaterals mentioned in Title 4, Chapter 3, Section 24, paragraph (5) should not cause additional financial burden on the shippers side.

In the end we would like to mention that for the sake of minimization of balancing costs all Balance Group Members should have a direct access to its balancing group position updated on hourly basis.

We hope that our comments will be taken into account in the course of the redesigning of the Austrian gas balancing system.

Best regards,

**Alexandra Afonina**

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