

Brussels 17-10-2016

Responses to the ENTSOG EU Data Harmonisation Public Consultation -September 2016

ENTSOG System Operations

Image Courtesy of Thyssengas

Results of CNOT public consultation September 2016

We received responses from:

- Denmark
- Netherlands
- Norway
- Spain
- United Kingdom

3 respondents requested confidentiality and they are not included in the Annex.

The answers of 4 TSOs were not taken into consideration for the outcome of the Public Consultation.

11 Respondents



50**C**

Results of CNOT public consultation September 2016

Do you agree with the proposed lead time of 12 months?



Do you agree with the common data exchange solution proposals?



(*) The No Answers are related to data exchanges that are either not part of the regulation or data exchanges where the respondent is not involved.



CAM/CMP Data Exchanges Reponses Do you agree with the proposed common data exchange solution?





Votes for CAM/CMP Data Exchange Solutions



Some parties indicated multiple votes for each data exchange solutions without preference for which would be the first choice. Therefore the sum of votes is higher than the number of participants.



Overall NOM/MAT Data Exchanges Do you agree with the proposed common data exchange solution?



The "No Answers" are related to data exchanges where the respondents are not involved.



Votes for NOM/MAT Data Exchanges



The "No Answers" are related to data exchanges where the respondents are not involved.

Stakeholder CAM/CMP Feedback



The selection of Document Based implies the implementation of AS4, which would involve additional costs for processes.

The key issue is to ensure that a formal, harmonised, data format and content is defined. ENTSOG should push in a modern direction that makes it possible lower costs in the long run. If ENTSOG chooses Interactive they place the gas business many years behind other areas of business.

When many auctions are running at the same time, the deal capture process is very important, Interactive data exchange will make it very difficult for NU's, choosing document based will reduce the risk of manual errors.

Common data exchange solutions should be limited to recommendations the imposition of a single common data exchange could endanger the current solution flexibility.

Interactive is against a harmonisation.

Interactive is not efficient for the large amount of network points, automation with client/server systems is needed - Mass data processes.

NOM/MAT Feedback



The selection of Document Based implies the implementation of AS4, which would involve additional costs for processes that are currently performed through solutions 100% compatible with the Interoperability Network Code. We understand that the definition of the common data exchange solutions provided by article 21 of the Interoperability Network Code provide a sufficient level of harmonisation with the utilisation of Edig@s formats. The imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility, what may be the best solution for one party may be different for a different user.

Beware: Registered End User (Shippers) are not forced to use AS4 by the IO&DE NC (only TSOs)

Overall, we agree with the proposed solutions and the proposal to harmonise data exchange at European level, it decreases the administrative and financial burden. Interactive solutions must be delivered with robustness and performance in mind, as well as possibilities to connect via automated interfaces. Based on our experience, in spite of common data exchange solutions, document based solutions must be considered as a fallback solution. They are to be used if, for instance IT-systems fail to work, and thus guarantee a well-functioning communication with amongst others auction offices and primary exchange platforms.

Feedback on Implementation Lead time



Most respondents agree with the proposed lead time of 12 months for implementation of the common data exchange solutions

Do you agree with the proposed lead time of 12 months?



Alternative Proposals:

- 6 Months (1 Vote)
- Adapt timeline to beginning of 2018 and exceptional usage of AS2 in different countries (1 Vote)





- Larger stakeholders prefer fully automated solutions (document based, Edigas-XML)
- Smaller stakeholders prefer less automated, possibly cheaper solutions (interactive)



For more information please contact:

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The following pages contain the non-confidential individual answers to the Public Consultation, TSOs excluded.

| Company name/Organisation Vita Capital Trading st. Post address | Date | | Author name | | E-mail / phone |
|---|------|--|---------------------------|-------------------------|----------------|
| Data 28/09/2016 | | | Company name/Organisation | Vita Capital Trading sL | Post address |
| | | | Date | 28/09/2016 | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

hange Solution Date of Agree

Recommendation is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not enforceable but is to be considered as a "recommendation" to encourage harmonication, and are to be negotiated biaterally on a case by case basis.

Date of Publication After a lead time of 12 months starting from the date of publication, the TSOs or parties *acting on behalf of TSOs* shall make the Common Data Exchange Solution available for use with their counter parties. (see also quastion on line 7 in the table below)

Becognitions: In the case of Median Status which are not connected to the interconnected EU patient and hold a decognition (or Art 49 of decive 200973EC), the Common Data Exchange Solution should be made available not later than the time of the catalablement of the connection with the interconnected EU network (see also Art (2) Network code transperaidily)

Confidentiality: ENTSOG reserves the right to publish all of the individual responses to the public consultation (with exception of personal information) unless you indicate otherwise in the questionnaire.

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| Process Area Value | ans | Document Chapter | r Document Line Number | Information Flow | From Party Role Value | To Party Role Value | Confidential ity Level | Common Data Exchange Solution | Date of Publication | Agree YES / NO | Alternative proposal | Comments / Rationale for an alternative proposal |
|---|--|---------------------------------------|---|--|---|---|---------------------------|--|------------------------|-------------------|----------------------------------|---|
| Confidentiality Implementation lead time | Please indicate whether you would like any part of Do you agree with the proposed lead time of 12 m | the information p onths for new or | rovided be kept confide changed versions of th | ential and be reported only in an aggregated in e Business Requirement Specifications and (| nanner CNOTs? | | | | | No | | |
| | | 3.3.1.2 | 509 515 | Network User Registration | Network User | Transmission System Opera | t: Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.3 3.3.1.4 | 522 | Network User Registration to Auction Offic Approved Network Users | e Network User Auction Office | Auction Office Registered Network User | Private Private | Recommendation - interactive Recommendation - interactive | | Yes Yes | | |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Intercoverability Network Code, provides a sufficient level of |
| | | 3.3.1.5 | 531 | | | | | | | | | harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig08 formats, and the imposition of a single common data exchange solutions is not necessary and |
| | | 3.3.1.6 | 551 | | | | | | | | | harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and could endancer the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Offered Capacity | Auction Office | Registered Network User | Public | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. The Common Data Exchance Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | | | | | | | | | | | The Common Usa Exchange Solutions in the CNU is should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig (is formats, and the imposition of a single common data exchange solution is not necessary and |
| | | 3.3.1.8 | 572 | | | | | | | | | harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user |
| | | 3.3.1.9 | 578 | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 3.3.1.9 | 576 | | | | | | | | | harmonization with the utilization of Edig®s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | 3.3.1.11 | 590 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Aggregated Auction Results | Auction Office | | Public | | 1/11/2016 | | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| Capacity Trading Processes | CAP0554_160412_BRS_CAM+CMP_V18.docx | | | Aggregated Auction Results | Auction Office | Al | PUDIC | Interactive | 1/11/2016 | NO | Recommendation - interactive | dfferent user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. |
| | | 3.3.1.12 | 601 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOT's should be initiated to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edio Rs formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Surrendered Canacity Sold | Transmission System Operator | Registered Network Liser | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.14 | 614 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions regulated by the acticle 21 of the Intercoverability Network Code, provider a sufficient level of |
| | | 3.3.1.15 | 626 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is net necessary and |
| | | | | Allocate Reverse Auction Results | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
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| | | 3.3.2 | 643 | | | | | | | | | harmonization with the utilization of Edig Bs formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Secondary Market Sales | Registered Network User | Transmission System Opera | t: Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 3.3.2 | 651 | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Secondary Market Sales | Transmission System Operator | Registered Network User | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. |
| | | 3333 | 282 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition |
| | | 0.0.0.0 | 101 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Nomination Authorisation | Registered Network User | Transmission System Opera | k Private | Recommendation - Document Based | | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | We cannot agree with the selection of bocument based as this solution implies the implementation or ASA, which would involve adoitional costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 338 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOT's should be imited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edg@s formats, and the imposition of a single common data exchange solution is not necessary and |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endancer the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Nomination | Registered Network User | (Initiating) Transmission Svs | te Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | 3.4.1 | 338 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 330 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Nemination | Registered Network User | (Matching)Transmission Svs | . Drivete | Document Based | 1/11/2016 | No | Recommendation - interactive | ramonization with the duitation of Edg (s) formals, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different one of the solution for edge solution is not necessary and the most solution for one party may be different for a |
| | | 3.4.1 | 347 | Nomination Forward single sided nomination | (Active) Transmission System Ope | r (Passive) Transmission Syst | e Private | Document Based | 1/11/2016 | INO | recommendation - interactive | |
| | | 3.4.1 3.4.1 | 354 362 | Processed Quantities Matching Results | (Initiatino) Transmission System O (Matchino)Transmission System O | c (Matching)Transmission Svs c (Initiating) Transmission Svs | te Private te Private | Document Based Document Based | 1/11/2016 1/11/2016 | | | |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.doc | | | | | | | | | | | We cannot agree with the selection or Document based as this solution implies the implementation of A-sk, which would involve additional costs for processes that in Spain are currently performed through solutions 700% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOT's should be limited to recommendatione – we understand that the definition |
| | | 3.4.1 | 367 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interopenability Network Code provides a utilicient level of harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Confirmation Notice | (Initiating) Transmission System O | p Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | 3.4.1 | 367 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | | | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Confirmation Notice | (Matching)Transmission System O | r Registered Network I ! | Private | Document Based | 1/11/2015 | No | Recommendation - interration | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user |
| | | | | Commelon Noice | measurement of the second system of | Congratered retrition USEF | . Trvate | Document Debeu | 1/11/2016 | 140 | ressonation cancer - manufactive | |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. |
| | | 3.4.1 | 375 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Interruption Notice | (Initiating) Transmission System O | c Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. |
| | | 3.4.1 | 375 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edig Bis formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Interruption Notice | (Matching)Transmission System O | Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | |

| Date | | Author name | | E-mail / phone |
|------|---|---------------------------|---------------|----------------|
| | · | Company name/Organisation | Vattenfall AB | Post address |
| | | Date | 30/09/2016 | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

Recommendation is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not enforceable but is to be considered as a "recommendation" to encourage harmonisation, and are to be negotiated bilaterally on a case by case basis.

"Date of Publication" After a lead time of 12 months starting from the date of publication, the TSOs or parties "acting on behalf of TSOs" shall make the Common Data Exchange Solution available for use with their counter parties. (see also question on line 7 in the table below)

Derogations: In the case of Member States which are not connected to the interconnected EU network and hold a derogation (re Art 49 of directive 2009/73/EC), the Common Data Exchange Solution should be made available not later than the time of the establishment of the connection with the interconnected EU network (see also Art1 (2) Network code Interoperability)

Confidentiality: ENTSOG reserves the right to publish all of the individual responses to the public consultation (with exception of ersonal information) unless you indicate otherwise in the questionnaire.

| Process Area Value | BRS | Deserved Character | Document Line Number | Information flow | From Party Role Value | To Party Role Value | Confidentia ity Level | Common Data Exchange Solution | Date of Publication | Agree YES / NO | Alternative | Comments / Rationale for an alternative proposal |
|-------------------------------------|--|--------------------|----------------------|---|-------------------------------------|---|--------------------------|---------------------------------|------------------------|-------------------|-------------|---|
| | Please indicate whether you would like any part of | | | | | To Party Role Value | ity Level | | Publication | | proposal | proposal |
| Confidentiality | Do you agree with the proposed lead time of 12 i | | | | | | | | | No | | |
| Implementation lead time | Do you agree with the proposed lead time of 121 | | | | | | | le contra a | | Yes | | |
| | | 3.3.1.2 3.3.1.3 | 509 515 | Network User Registration | Network User | Transmission System Operator | Private | Recommendation - interactive | | Yes | | Vattenfall welcomes the |
| | | 3.3.1.3 | | Network User Registration to Auction Office | | Auction Office | Private | Recommendation - interactive | | Yes | | opportunity to comment on the |
| | | 3.3.1.4 3.3.1.5 | 522 531 | Approved Network Users | | Registered Network User | Private | Recommendation - interactive | | Yes | | Common Data Exchange |
| | | | | Surrender Capacity Rights | | Auction Office | Private | Interactive | 1/11/2016 | | | Proposals. Overall, we agree with |
| | | 3.3.1.6 | | Offered Capacity | | Registered Network User | Public | Interactive | 1/11/2016 | | | the proposed solutions and the |
| Capacity Trading Processes | CAP0554 160412 BRS CAM+CMP V18.docx | 3.3.1.8 | 572 578 | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | | | proposal to harmonise data |
| Capacity frading Processes | CAP0554_160412_BR5_CAW+CWP_V16.000X | 3.3.1.9 | | Allocated Capacity | | Registered Network User | Private | Interactive | 1/11/2016 | | | exchange between the parties |
| | | 3.3.1.11 | | Aggregated Auction Results | Auction Office | All | Public | Interactive | 1/11/2016 | | | concerned at European level. This |
| | | 3.3.1.12 | 601 | Surrendered Capacity Sold | | Registered Network User | Private | Document Based | 1/11/2016 | | | is to the benefit of Vattenfall as it |
| | | 3.3.1.14 | 614 | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | | | decreases the administrative and |
| | | 3.3.1.15 | 626 | Allocate Reverse Auction Results | | Registered Network User | Private | Interactive | 1/11/2016 | | | financial burden that related to |
| | | 3.3.2 | 643 | Secondary Market Sales | Registered Network User | Transmission System Operator | Private | Interactive | 1/11/2016 | | | having different data exchanges in |
| | | 3.3.2 | 651 | Secondary Market Sales | | Registered Network User | Private | Interactive | 1/11/2016 | | | place. |
| | | 3.3.3.3 | 282 | Nomination Authorisation | Registered Network User | Transmission System Operator | Private | Recommendation - Document Based | | Yes | | |
| | | 3.4.1 | 338 | Nomination | Registered Network User | (Initiating) Transmission System Operator | Private | Document Based | 1/11/2016 | | | We would like to highlight that |
| | | 3.4.1 | | Nomination | | (Matching)Transmission System Operator | Private | Document Based | 1/11/2016 | | | interactive solutions must be |
| | | 3.4.1 | | Forward single sided nomination | | (Passive) Transmission System Operator | Private | Document Based | 1/11/2016 | | | delivered with robustness and |
| | | 3.4.1 | | Processed Quantities | | (Matching)Transmission System Operator | Private | Document Based | 1/11/2016 | | | performance in mind, as well as |
| | | 3.4.1 | | Matching Results | | (Initiating) Transmission System Operator | Private | Document Based | 1/11/2016 | | | possibilities to connect via |
| | | 3.4.1 | | Confirmation Notice | (Initiating) Transmission System Op | | Private | Document Based | 1/11/2016 | | | automated process interfaces. |
| | | 3.4.1 | | Confirmation Notice | (Matching)Transmission System Op | | Private | Document Based | 1/11/2016 | | | |
| | | 3.4.1 | 375 | Interruption Notice | (Initiating) Transmission System Op | | Private | Document Based | 1/11/2016 | | | Based on our experience we woul |
| Nomination and Matching Brassess | BAL0453 160412 BRS on nominations V17.doo | | | Interruption Notice | (Matching)Transmission System Op | Registered Network User | Private | Document Based | 1/11/2016 | Yes | | like to stress that in spite of |
| Normination and matching i rocesse. | 5 DAE0435_100412_DIX5 0111011111010113_0113_0113 | | | | | | | | | | | common data exchange solutions |
| | | | | | | | | | | | | document based solutions must b |
| | | | | | | | | | | | | considered as a fall-back solution |
| | | | | | | | | | | | | They are to be used if, for instance |
| | | 3.4.1 | 375 | | | | | | | | | IT-systems fail to work, and thus |
| | | | | | | | | | | | | guarantee a well-functioning |
| | | | | | | | | | | | | communication with amongst |
| | | | | | | | | | | | | others auction offices and primary |
| | | | | | | | | | | | | exchange platforms. |
| | | | | | | | | | | | | |

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|-----------------------------------|---|--|--|---|---|---|-------------------------------|---|-------------------------------------|----------------------------------|---|---|
| ate: 14.09.2016 | | Statol ASA | | | | | | The different common data exchange | solutions show | vo io colur | nn Lare defined in | the Interoperability Network code |
| | | 14/09/2016 | | | | | | Art 21. | | | | |
| | | | | | | | | "Recommendation" is used in cases requirement specification) which are r enforceable but is to be considered as | not explicitly pa a 'recommen | art of the n idation" to | encourage harmo | e BRS document (business such the proposed solution is not onisation, and are to be negotiated |
| | | | | | | | | "Date of Publication" After a lead t "acting on behalf of TSOs" shall make | ime of 12 mor the Common I | 1th s starti Data Exch | | |
| | | | | | | | | parties. (see also question on line 7 in Derogations: | the table below | w) | | |
| | | | | | | | | In the case of Member States which a Art 49 of directive 2009/73/EC), the C time of the establishment of the conne Interoperability) | ommon Data E ction with the i | Exchange | Solution should be cted EU network (| e made available not later than the (see also Art1 (2) Network code |
| | | | | | | | | Confidentiality: ENTSOG reserves the right to publish personal information) unless you indic | all of the indiv | idual resp | onses to the public | c consultation (with exception of |
| | | | | | | | Confidential | personal information) unless you indic | Date of | Agree | Alternative | Comments / Rationale for an alternativ |
| cess Area Value nfidentiality | ats Please indicate whether you would like any part of | Document Chapte I the information p | r Document Line Numbe provided be kept confid | Information flow Intial and be reported only in an aggregated Business, Reputsment Specifications and | From Party Role Value manner | To Party Role Value | ity Level | | Publication | YES / NO | Alternative proposal | proposal |
| lementation lead time | Do you agree with the proposed lead time of 12 m | 3.3.1.2 3.3.1.3 | 509 515 | Network Liner Degistration | Network Urge | Transmission System Operator | Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.4 | 522 | Network User Registration to Auction Offic Approved Network Users | Auction Office | Auction Office Registered Network User | Private Private | Recommendation - interactive | | Yes Yes | Document Bases | We should have the possibility to |
| | | | | | | | | | | | | submit from our system capacity that could be surrendered. It ensures that there is no |
| | | 3.3.1.5 | 531 | | | | | | | | | divergence with their backend |
| | | | | | | | | | | | | the reply which is document base (line 16). The key issue is to ensure that a formal, harmonised data format and content is define |
| | | | | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | NO | | |
| | | | | | | | | | | | Document Bases | Shippers should have the possibility to download the offered capacity in a standard data forma in order to be able to process |
| | | | | | | | | | | | | in order to be able to process different possibilities and costs. In particular if there are many |
| | | 3.3.1.6 | 551 | | | | | | | | | interconnection points that have to be evaluated for the period in |
| | | | | | | | | | | | | question. This could involve a hig volume of information which is no suited to an interactive solution. |
| | | | | Offered Capacity | Auction Office | Registered Network User | Public | Interactive | 1/11/2016 | NO | | Interactive is against a |
| | | | | | | | | | | | | Even if most companies do not have support for the bidding process yet ENTSOG should choose a formal, harmonised dat |
| | | | | | | | | | | | | process yet ENTSOG should home a lower, harmonised data home and where the content is a data and the content is a data and the content is common data solution is not marrowing anything. NU's should have the possibility to submit bids them their system in order to ensure that them is no difference between the backet system. content and he bid content. This domains when the bids content the backet system and bid coherence). |
| | | | | | | | | | | | | defined and choose an option for the future. To set interactive as |
| | | 3.3.1.8 | 572 | | | | | | | | | harmonising anything. NU's shou have the possibility to submit bids |
| | | 0.0.1.0 | 572 | | | | | | | | | from their system in order to ensure that there is no difference between the backend system |
| | | | | | | | | | | | | content and the bid content. This could involve a high volume of |
| | | | | | | | | | | | | information which is not suited to an interactive solution (error pror and not possible to guarantee |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | NO | Document Bases | backend system and bid coherence). |
| | | | | | | | | | | | | Shippers want the ability to receiv bulk transmission of their allocations in order to be able to |
| spacity Trading Processes | CAP0554_160412_BRS_CAM+CMP_V18.docx | | | | | | | | | | | align these with the internal system. When many auctions is |
| | | 3.3.1.9 | 578 | | | | | | | | | running at the same time and the deal capture process is very important Interactive will make it |
| | | | | | | | | | | | | very difficult for NU's that are active in more than 1-3 IP's. This |
| | | | | | | | | | | | | bulk transmission of their allocations in order to be able to align beas with the internal system. When many succions is running at the same time and the dall capture process is very important histractive will make it very difficult for NU's that are active in more than 1-3 IPs. This could involve a high volume of Hormston which is not suited to an interactive subtino. Choosing document based will reduce the fixed or manual errors. |
| | | | | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | NO | Document Based | document based will reduce the risk of manual errors. |
| | | 3.3.1.11 | 590 | | | | | | | | Document Bases | According to article 17 of the EU CAM this should also be delivered as soon as possible between |
| | | 3.3.1.11 | 590 | Aggregated Auction Results | Auction Office | Al | Public | | | | | bidding rounds. To make this interactive will lead to manual wor for NU's |
| | | 3.3.1.12 | 601 | Aggregated Auction Results Surrendered Capacity Sold | Transmission System Operator | All Registered Network User | Private | Document Based | 1/11/2016 1/11/2016 | YES | Document Bases | |
| | | | | | | | | | | | | The key issue is to ensure that a formal, harmorised, data format and content is defined. In 2016 ENTSOG should push us in a modern direction that makes it uposable for all tog to lower cost in the long run. Interactive do not support that. If ENTSOG choose Interactive they place the gas business many usats behind dhet areas of business. The key issue is to ensure that a |
| | | 3.3.1.14 | 614 | | | | | | | | | modern direction that makes it possible for all to get lower cost in |
| | | | | | | | | | | | | the long run. Interactive do not support that. If ENTSOG choose Interactive they place the gas |
| | | | | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No | | business many years behind othe areas of business. |
| | | | | | | | | | | | | |
| | | 3.3.1.15 | 626 | | | | | | | | | and content is defined. In 2016 ENTSOG should push us in a modern direction that makes it |
| | | | | Allocate Reverse Auction Results | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No | Document Base | possible for all to get lower cost i the long run. Interactive do not support that. |
| | | | | | | - | | | | | | The key issue is to ensure that a formal, harmonised, data format |
| | | 3.3.2 | 643 | | | | | | | | | and content is defined. In 2016 ENTSOG should push us in a modern direction that makes it |
| | | | | | Registered Network User | Transmission System Operator | | | 1/11/2016 | | | and content is defined. In 2016 ENTSOG should push us in a modern direction that makes it possible for all to get lower cost i the long run. Interactive do not support that. |
| | | | | Secondary Market Sales | Registered Network User | ransmission System Operator | Private | interactive | 1/11/2016 | No | Document Bases | support that. The key issue is to ensure that a formal, harmonised, data format and contern is defined. In 2016 ENTSOG should push us in a modern direction that makes it possible for all to get lower cost in the long run. Interactive do not support that. |
| | | 3.3.2 | 651 | | | | | | | | | and content is defined. In 2016 ENTSOG should push us in a |
| | | | | | | | | | | | | modern direction that makes it possible for all to get lower cost i the long run. Interactive do not |
| | | 3.3.3.3 | 282 | Secondary Market Sales Nomination Authorisation | Transmission System Operator Registered Network User | Transmission System Operator | Private Private | Interactive Recommendation - Document Based | 1/11/2016 | Yes | Document Bases | support that. |
| | | 3.4.1 3.4.1 3.4.1 | 338 338 347 354 | Nomination Nomination Forward single sided nomination | Registered Network User Registered Network User (Active) Transmission System Op | (Initiating) Transmission System (Matching) Transmission System (Passive) Transmission System | Private | Document Based Document Based Document Based | 1/11/2016 1/11/2016 1/11/2016 | Yes | | |
| Iomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.doc | 341 | 354 362 | Processed Quantities Matching Results | (Initiating) Transmission System C (Matching)Transmission System C | (Matching)Transmission System (Initiating) Transmission System | Private Private | Document Based Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 3.4.1 3.4.1 3.4.1 | 362 367 367 375 | Confirmation Notice Confirmation Notice Interruption Notice | (Initiating) Transmission System C (Matching)Transmission System C (Initiating) Transmission System C | g Registered Network User | Private Private Private | Document Based Document Based Document Based | 1/11/2016 1/11/2016 1/11/2016 | Yes Yes Yes | | |
| | | 3.4.1 | 375 | Interruption Notice | (Initiating) Transmission System C (Matching)Transmission System C | Is Registered Network User | Private | Document Based Document Based | 1/11/2016 | Yes | | |

| Corneanv name/Organisation Factor Energia, S.A. Post address Date 2009/2016 | Date | Author name | | E-mail / phone |
|--|------|---------------------------|----------------------|----------------|
| Date 30/09/2016 | | Company name/Organisation | Factor Energia, S.A. | Post address |
| | | Date | 30/09/2016 | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

hange Solution Date of Agree

Recommendation is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not enforceable but is to be considered as a "recommendation" to encourage harmonication, and are to be negotiated biaterally on a case by case basis.

Date of Publication After a lead time of 12 months starting from the date of publication, the TSOs or parties *acting on behalf of TSOs* shall make the Common Data Exchange Solution available for use with their counter parties. (see also quastion on line 7 in the table below)

Perceptions: In the case of Member States which are not connected to the interconnected EU network and hold a derogation (in Ar44) of directive 2009/73/EC), the Common Data Exchange Solidon should be made available not later than the time of the establishment of the connection with the interconnected EU network (see also Art 2) Network code Interceptivally)

Confidentiality: ENTSOG reserves the right to publish all of the individual responses to the public consultation (with exception of personal information) unless you indicate otherwise in the questionnaire.

| Process Area Value | BRS | Document Chapte | r Document Line Number | Information Flow | From Party Role Value | To Party Role Value | Confidential ity Level | Common Data Exchange Solution | Date of Publication | Agree YES / NO / | Alternative proposal | Comments / Rationale for an alternative proposal |
|-----------------------------------|--|--------------------|-------------------------|--|---|--|---------------------------|----------------------------------|------------------------|---------------------|------------------------------|--|
| Confidentiality | Please indicate whether you would like any part of Do you agree with the proposed lead time of 12 m | the information p | rovided be kept confide | ential and be reported only in an aggregated n | anner MOTe7 | • | | | | No | | |
| Renation lead one | and the second proposed was drift of 12 m | 3.3.1.2 | 509 | Network User Registration | Network User | Transmission System Operat | t: Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.3 3.3.1.4 | 515 522 | Network User Registration to Auction Offic Approved Network Users | Network User Auction Office | Auction Office Registered Network User | Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.4 | 522 | Approved Network Users | Auction Office | Registered Network User | Private | Recommendation - interactive | | res | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.5 | 531 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 3.3.1.5 | 531 | | | | | | | | | harmonization with the utilization of Edig (8) formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No I | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Intercoverability Network Code, provides a sufficient level of |
| | | 3.3.1.6 | 551 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edg 8s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility-which is important as what may be the best solution for one party may be different for a |
| | | | | Offered Capacity | Auction Office | Registered Network User | Public | Interactive | 1/11/2016 | No B | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.8 | 572 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | | | | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | NO I | Recommendation - Interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | 3.3.1.9 | 578 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edio Ris formats, and the imposition of a sindle common data exchange solution is not necessary and |
| | | 0.0.1.0 | 510 | | | | | | | | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No I | Recommendation - interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | | | | | | | | | | | |
| | | 3.3.1.11 | 590 | | | | | | | | | harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| Capacity Trading Processes | CAP0554_160412_BRS_CAM+CMP_V18.docx | | | Aggregated Auction Results | Auction Office | All | Public | Interactive | 1/11/2016 | No I | Recommendation - interactive | diferent user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | We cannot agree with me selection of Document based as this solution implies the implementation or in-SA- which would invoke adaptional costs for processes that in Spain are currently performed through solutions (100%) compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.3.1.12 | 601 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition |
| | | | | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Surrendered Capacity Sold | Transmission System Operator | Registered Network User | Private | Document Based | 1/11/2016 | N | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | ourrenselled capacity dold | manantission aystem operator | regulation retaining USEF | . Trvate | Document Dabieu | 1/11/2016 | | Necona Necona Cive | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.14 | 614 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No I | Recommendation - interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | 3.3.1.15 | 626 | | | | | | | | | The common data exchange solutions provided by the article 21 of the Intercentations – we understand that we deministrict are common data exchange solutions provided by the article 21 of the Intercentations – we understand that we deministrict are harmonization with the utilization of Edg @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | 3.3.1.15 | 626 | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Allocate Reverse Auction Results | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No I | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations — we understand that the definition of the common data exchange solutions provided by the article 21 of the interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and |
| | | 3.3.2 | 643 | | | | | | | | | harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Secondary Market Sales | Registered Network User | Transmission System Operat | k Private | Interactive | 1/11/2016 | No I | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 3.3.2 | 651 | | | | | | | | | harmonization with the utilization of Edio B's formats and the imposition of a single common data exchange solution is not necessary and |
| | | | | Secondary Market Sales | Transmission System Operator | Registered Network User | Private | Interactive | 1/11/2016 | No B | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.3.3.3 | 282 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Nomination Authorisation | Registered Network User | Transmission System Operat | t: Private | Recommendation - Document Based | | No I | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | 3.4.1 | 338 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 338 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Nomination | Registered Network User | (Initiating) Transmission Syst | te Private | Document Based | 1/11/2016 | No I | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | 3.4.1 | 338 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 0.4.1 | 550 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| 1 | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | 3.4.1 | 347 | Nomination Forward single sided nomination | Registered Network User (Active) Transmission System Ope | (Matching)Transmission Syst (Passive) Transmission Syst | tr Private | Document Based Document Based | 1/11/2016 | No I | Recommendation - interactive | different user. |
| | | 3.4.1 | 354 | Processed Quantities | (Initiating) Transmission System Or | (Matching)Transmission Syst | te Private | Document Based | 1/11/2016 | | | |
| | | 3.4.1 | 362 | Matching Results | (Matching)Transmission System O | (Initiating) Transmission Syst | te Private | Document Based | 1/11/2016 | | | |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.doc | | 367 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 301 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of the article 21 of the Interoperability of the sufficient level of the suffici |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Confirmation Notice | (Initiating) Transmission System Op | Registered Network User | Private | Document Based | 1/11/2016 | No I | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code |
| | | 3.4.1 | 367 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOT's should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Confirmation Notice | (Matching)Transmission System O | Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | |
| | | 3.4.1 | 375 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNVTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Interruption Notice | (Initiating) Transmission System Or | Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 375 | | | | | | | | | the common data exchange solutions provided by the article 21 of the intercoperability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | | | | | | | | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Interruption Notice | (Matching)Transmission System O | Registered Network User | Private | Document Based | 1/11/2016 | No I | Recommendation - interactive | different user. |
| | | | | | | | | | | | | |

| Date: 30 September 2016 | Author name | EASEE-gas | E-mail / phone |
|-------------------------|---------------------------|--------------------------|----------------|
| | Company name/Organisation | EASEE-gas (European Asso | Post address |
| | Date | 30.09.2016 | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

<u>Recommendation</u> is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not redrocreable but is to be considered as a "recommendation" to encourage harmonisation, and are to be neglotated bialterecommendation (case basis.

"Date of Publication" After a lead time of 12 months starting from the date of publication, the TSOs or parties "acting on behalf of TSOs" shall make the Common Data Exchange Solution available for use with their counter parties. (see also question on line 7 in the table below)

Descapitions: In the cate of Member States which are not connected to the interconnected EU network and hold a derogation (re Art 46 of directive 2009/72/EC), the Common Data Exchange Solution should be made available not later than the time of the establishment of the connection with the interconnected EU network (see also Art1 (2) Network: code literogenability)

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| | | | | | | | | consultation (with e | xception of | perso | nal informatio | n) unless you indicate otherwise in | |
|--|---|-------------------------|-------------------------|--|---|---|---------------------------|----------------------------------|------------------------|-----------------------|-------------------------|---|--|
| | BRS Please indicate whether you would like any part | Document Chapter | Document Line Number | Information Flow | From Party Role Value | To Party Role Value | Confidentia lity Level | Common Data Exchange Solution | Date of Publication | Agre e YES / NO | Alternative proposal | Comments / Rationale for an alternative proposal | Reasons |
| Confidentiality Page 10 Page 1 | Please indicate whether you would like any part Do you agree with the proposed lead time of 12 | t of the informatio | on provided be kept con | Idential and be reported only i the Business Requirement So | n an aggregated manner ecifications and CNOTs2 | | | | | - | | | |
| inplementation lead time | | 3.3.1.2 | 509 | | | Transmission System Operato | Private | Recommendation - | interactive | | | | |
| | | 3.3.1.3 | 515 | Network User Registration to | | Auction Office | Private | Recommendation - | | | | | |
| | | 3.3.1.4 | 522 | Approved Network Users | Auction Office | Registered Network User | Private | Recommendation - | interactive | | | | |
| | | | | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | ***** | No | document | Companies should have the | The key issue is to |
| | | | | | | | | | | | based; interactive | possibility to submit from thier system capacity that could be | ensure that a formal, |
| | | | | | | | | | | | may be | surrendered. It ensures that there | harmonised, data forma and content is defined |
| | | 3.3.1.5 | 531 | | | | | | | | used as a | is no divergence with their | and content is defined |
| | | | | | | | | | | | secondary | backend system. This is also | |
| | | | | | | | | | | | approach | coherent with the reply which is | |
| | | | | | | | | | 1 | _ | | document based (line 16). | |
| | | | | Offered Capacity | Auction Office | Registered Network User | Public | Interactive | ***** | No | document | Companies should have the | The key issue is to |
| | | | | | | | | | | | based; interactive | possibility to download the offered capacity in a standard data format | ensure that a formal, harmonised, data form |
| | | | | | | | | | | | may be | in order to be able to process | and content is defined |
| | | | | | | | | | | | used as a | different possibilities. In particular | |
| | | 3.3.1.6 | 551 | | | | | | | | secondary | if there are many interconnection | |
| | | | | | | | | | | | approach | points that have to be evaluated for the period in guestion. This | |
| | | | | | | | | | | | | could involve a high volume of | |
| | | | | | | | | | | | | information which is not suited to | |
| | | | | | | | | | | | | an interactive solution. | |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | **** | No | document | Companies should have the | The key issue is to |
| | | | | | | | 1 | | | | based; | possibility to submit bids from | ensure that a formal, |
| | | | | 1 | | | 1 | | | | interactive may be | their system in order to ensure | harmonised, data form |
| | | | | | | | 1 | | | | may be used as a | that there is no difference between the backend system | and content is defined |
| | | 3.3.1.8 | 572 | | | | 1 | | | | used as a secondary | content and the bid content. This | |
| | | | | | | | 1 | | | | approach | could involve a high volume of | |
| | | | | | | | | | | | | information which is not suited to | |
| | | | | | | | | | | | | an interactive solution (error | |
| | | | | | | | | | | | | prone and not possible to | |
| | | | | Alle sets of Oceanally | Austine Office | Production of Machine etc. (1) | Driverte | Internet in a | | | document | guarantee backend system and Companies should be able to | The law laws in the |
| | | | | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | **** | NO | based: | receive bulk transmission of their | The key issue is to ensure that a formal. |
| | | | | | | | | | | | interactive | allocations in order to be able to | harmonised, data form |
| | | | | | | | | | | | may be | align these with the internal | and content is defined |
| | | 3.3.1.9 | 578 | | | | | | | | used as a | system. This could involve a high | |
| | | | | | | | | | | | secondary | volume of information which is not | |
| apacity Trading Processes | CAP0554_160412_BRS_CAM+CMP_V18.docx | | | | | | | | | | approach | suited to an interactive solution and reduce the risk of manual | |
| | | | | | | | | | | | | and reduce the risk of manual errors. | |
| | | | | | | | | | 1 | | | | |
| | | | | Aggregated Auction Results | Auction Office | All | Public | Interactive | ***** | No | document based: | Companies should be able to receive the entire contents of an | The key issue is to |
| | | | | | | | | | | | interactive | auction in order to be able to | ensure that a formal, harmonised, data forma |
| | | 3.3.1.11 | 590 | | | | | | | | may be | carry out internal analysis in their | and content is defined |
| | | | | | | | | | | | used as a | system | and content is defined |
| | | 3.3.1.12 | 601 | Surrendered Capacity Sold | Transmission Contara Ora | De sistere d Naturale Hans | Private | Document Based | | Vee | cococdory | | |
| | | 0.0.1.12 | 001 | Reverse Auction Bid | | Auction Office | Private | Interactive | aannaa | No | document | Companies should have the | The key issue is to |
| | | | | Reverse Automotive | Registered Hermoni Oser | Addition office | i muic | incruonite. | | | based; | possibility to submit bids from | ensure that a formal. |
| | | | | | | | | | | | interactive | their system in order to ensure | harmonised, data form |
| | | | | | | | | | | | may be | that there is no difference | and content is defined |
| | | 3.3.1.14 | 614 | | | | | | | | used as a secondary | between the system content and the bid content. Interactive is | |
| | | | | | | | | | | | approach | error prone and not possible to | |
| | | | | | | | 1 | | | | | guarantee backend system and | |
| | | | | 1 | | | 1 | | | | | bid coherence. | |
| | | | | | | | | | - | | | | |
| | | | | Allocate Reverse Auction Re | Auction Office | Registered Network User | Private | Interactive | aannaa | | document based: | Companies should be able to receive bulk transmission of their | The key issue is to ensure that a formal. |
| | | | | 1 | 1 | | | | | | interactive | allocations in order to be able to | ensure that a formal, harmonised, data form |
| | | 3.3.1.15 | 626 | 1 | 1 | | | | | | may be | align these with the internal | and content is defined |
| | | | | | 1 | | | | | | used as a | system | Somern is defined |
| | | | | | 1 | | | | | | secondary | | |
| | | | | | | | | | 4 | | approach | | |
| | | | | Secondary Market Sales | Registered Network User | Transmission System Operato | Private | Interactive | ***** | No | document based: | Companies should have the possibility to submit secondary | The key issue is to ensure that a formal, |
| | | | | 1 | | | 1 | | | | interactive | market information from thier | ensure that a formal, harmonised, data form |
| | | 3.3.2 | 643 | 1 | | | 1 | | | | may be | system in order to ensure that | and content is defined |
| | | | | 1 | | | 1 | | | | used as a | there is no difference between the | |
| | | | | | | | 1 | | | | secondary | backend system content and the | |
| | | | | | | | | | - | | approach | transmitted information content | |
| | | | | Secondary Market Sales | ransmission System Ope | Registered Network User | Private | Interactive | ****** | No | document based: | Companies should be able to receive bulk transmission of their | The key issue is to ensure that a formal. |
| | | | | 1 | 1 | | | | | | based; interactive | receive bulk transmission of their secondary market information in | ensure that a formal, harmonised, data form |
| | | 3.3.2 | 651 | 1 | 1 | | | | | | may be | order to be able to align these | and content is defined |
| | | | | 1 | 1 | | | | | | used as a | with the internal system | |
| | | | | | 1 | | | | | | secondary | | |
| | | | | | | | | - | | | approach | | |
| | | 3.3.3.3 | 282 | | Registered Network User | Transmission System Operato | Private | Recommendation - | Document | | | | |
| | | 3.4.1 3.4.1 | 338 338 | Nomination | Registered Network User | (Initiating) Transmission Syste | Private | Document Based Document Based | **** | Yes | | | |
| | | 3.4.1 3.4.1 | 338 347 | | (Active) Transmission Sum | (Matching)Transmission Syste (Passive) Transmission System | n Private | Document Based | ******* | | | | |
| | | | 354 | Processed Quantities | (Initiating) Transmission S | (Matching)Transmission Syste | Private | Document Based | ******* | Yes | | | |
| omination and Matching Processes B | BAL0453_160412_BRS on nominations_V17.do | 3.4.1 | 362 | Matching Results | (Matching)Transmission S | (Initiating) Transmission Syste | Private | Document Based | aannaa | Yes | | | |
| | | 3.4.1 | 367 | Confirmation Notice | (Initiating) Transmission S | | Private | Document Based | aaaanaa | | | | |
| | | | | | | | land a | Document Based | **** | Van | | | |
| | | 3.4.1 | 367 | Confirmation Notice | (Matching)Transmission S | | Private | | | | | | |
| | | 3.4.1 3.4.1 3.4.1 | 367 375 375 | Interruption Notice | | Registered Network User | Private | Document Based Document Based | **** | Yes | | | |

| Date | Author name | E-mail / phone |
|------|---------------------------|----------------|
| | Company name/Organisation | Post address |
| | Date | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

Recommendation is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not enforceable but is to be considered as a "recommendation" to encourage harmonisation, and are to be neglitated blatmary on a case by case basis.

"Date of Publication" After a lead time of 12 months starting from the date of publication, the TSOs or parties "acting on behalf of TSOs" shall make the Common Data Exchange Solution available for use with their counter parties. (see also question on line 7 in the table below)

Decoations: In the case of Member States which are not connected to the interconnected EU network and hold a decoation (re Art 46 of directive 2007/JEC), the Common Data Exchange Solution should be made available not later threat the time of the establishment of the connection with the interconnected EU network (see also Art1 (2) Network code Interogenation) Confidentiality

| Confidentiality: |
|--|
| ENTSOG reserves the right to publish all of the individual responses to the public |
| |

| | | | | | | | | Consultation (with a | the right to exception of | publis | n all of the in nal informatic | dividual responses to the public n) unless you indicate otherwise in | |
|-----------------------------------|---|----------------------------------|--------------------------|--|---|--|--|--|---|---|-----------------------------------|---|---|
| | | | | | | | | Common Data | | Agre | | | |
| Process Area Value | 995 | Document Chapter | Document Line Numbe | r Information Flow | From Party Role Value | To Party Role Value | Confidentia lity Level | Exchange Solution | | | Alternative proposal | Comments / Rationale for an alternative proposal | Patropr |
| Confidentiality | Please indicate whether you would like any part | t of the informatio | on provided be kept con | fidential and be reported only in an appreciated | manner | TO Fail by Hole Value | ney cever | I | Fublication | , | proposa | | Realong |
| Implementation lead time | Do you agree with the proposed lead time of 12 | 2 months for new | or changed versions o | f the Business Requirement Specifications and | CNOTs? | | | | | | | | |
| | | 3.3.1.2 | 509 | Network User Registration | Network User | Transmission System Operator | Private | Recommendation - | interactive | | | | |
| | | 3.3.1.3 3.3.1.4 | 515 522 | Network User Registration to Auction Office Approved Network Users | Auction Office | Auction Office Registered Network User | Private | Recommendation - | | - | | | |
| | | 3.3.1.4 | 522 | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | ###################################### | No | document | Companies should have the | The key issue is to |
| | | | | ounchilder oupdatily regins | Registered Heritoric Osci | | i invato | and a detrice | | | based; | possibility to submit from thier | ensure that a formal, |
| | | | | | | | | | | | interactive | system capacity that could be | harmonised, data format |
| | | 3.3.1.5 | 531 | | | | | | | | may be used as a | surrendered. It ensures that there is no divergence with their | and content is defined |
| | | | | | | | | | | | used as a secondary | backend system. This is also | |
| | | | | | | | | | | | approach | coherent with the reply which is | |
| | | | | | | | | | | | | document based (line 16). | |
| | | | | Offered Capacity | Auction Office | Registered Network User | Public | Interactive | ****** | No | document based: | Companies should have the possibility to download the offered | The key issue is to |
| | | | | | | | | | | | interactive | capacity in a standard data format | ensure that a formal, harmonised, data format |
| | | | | | | | | | | | may be | in order to be able to process | and content is defined |
| | | 3316 | 551 | | | | | | | | used as a | different possibilities. In particular | |
| | | 3.3.1.6 | 551 | | | | | | | | secondary approach | if there are many interconnection points that have to be evaluated | |
| | | | | | | | | | | | approach | for the period in question. This | |
| | | | | | | | | | | | | could involve a high volume of | |
| | | | | | | | | | | | | information which is not suited to | |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | | NIE | document | an interactive solution. Companies should have the | The key issue is to |
| | | | | Сараску Від | Registered Network User | Auction Onice | Private | Interactive | Databbi | NO | based: | companies should have the possibility to submit bids from | ensure that a formal. |
| | | | | | | | | | | | interactive | their system in order to ensure | harmonised, data format |
| | | | | | | | | | | | may be | that there is no difference | and content is defined |
| | | 3.3.1.8 | 572 | 1 | | | 1 | | | | used as a | between the backend system content and the bid content. This | |
| 1 | | 3.3.1.0 | 012 | 1 | | | 1 | | | | secondary approach | content and the bid content. This could involve a high volume of | |
| | | | | | | | | | | | | information which is not suited to | |
| | | | | | | | | | | | | an interactive solution (error | |
| | | | | | | | | | | | | prone and not possible to guarantee backend system and | |
| | | | | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | | No | document | Companies should be able to | The key issue is to |
| | | | | | | | | | | | based; | receive bulk transmission of their | ensure that a formal, |
| | | | | | | | | | | | interactive | allocations in order to be able to | harmonised, data format |
| | | 3319 | 578 | | | | | | | | may be used as a | align these with the internal system. This could involve a high | and content is defined |
| | | 3.3.1.9 | 5/8 | | | | | | | | secondary | volume of information which is not | |
| | | | | | | | | | | | approach | suited to an interactive solution | |
| Capacity Trading Processes | CAP0554_160412_BRS_CAM+CMP_V18.docx | c . | | | | | | | | | | and reduce the risk of manual errors. | |
| | | | | | | | | | | | | | |
| | | | | Aggregated Auction Results | Auction Office | All | Public | Interactive | nnaanni | No | document based: | Companies should be able to receive the entire contents of an | The key issue is to ensure that a formal. |
| | | | | | | | | | | | interactive | auction in order to be able to | harmonised, data format |
| | | 3.3.1.11 | 590 | | | | | | | | may be | carry out internal analysis in their | and content is defined |
| | | | | | | | | | | | used as a | system | |
| | | | | | | | | | | | secondary approach | | |
| | | 3.3.1.12 | 601 | Surrendered Capacity Sold | Transmission System Operator | Registered Network User | Private | Document Based | | | | | |
| | | | | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | ****** | No | document | Companies should have the possibility to submit bids from | The key issue is to ensure that a formal. |
| | | | | | | | | | | | based; interactive | their system in order to ensure | ensure that a formal, harmonised, data format |
| | | | | | | | | | | | may be | that there is no difference | and content is defined |
| | | 3.3.1.14 | 614 | | | | | | | | used as a | between the system content and | |
| | | | | | | | | | | | secondary approach | the bid content. Interactive is error prone and not possible to | |
| | | | | | | | | | | | approach | guarantee backend system and | |
| 1 | | | | 1 | | | 1 | | | | | bid coherence. | |
| 1 | | | | | | Deviations of Mathematic Manage | | In the set of the set | | | de sum es f | Companying about the ability | The loss lance in the |
| | | | | Allocate Reverse Auction Results | Auction Office | Registered Network User | Private | interactive | DNAADDI | No | document based: | Companies should be able to receive bulk transmission of their | The key issue is to ensure that a formal, |
| 1 | | | | 1 | 1 | | | | | | interactive | allocations in order to be able to | harmonised, data format |
| | | 3.3.1.15 | 626 | 1 | | | | | | | may be | align these with the internal | and content is defined |
| | | | | 1 | 1 | | | | | | used as a secondary | system | |
| | | | | 1 | | | | | | | approach | | |
| | | | | Secondary Market Sales | Registered Network User | Transmission System Operator | Private | Interactive | | No | document | Companies should have the | The key issue is to |
| | | | | | | | 1 | | | | based; | possibility to submit secondary | ensure that a formal. |
| | | 332 | 643 | 1 | | | 1 | | | | interactive may be | market information from thier system in order to ensure that | harmonised, data format and content is defined |
| 1 | | | - /2 | 1 | | | 1 | | | | may be used as a | there is no difference between the | and content is defined |
| 1 | | | | 1 | | | 1 | | | | secondary | backend system content and the | |
| 1 | | | | | | | 1 | | | | approach | transmitted information content | |
| 1 | | | | Secondary Market Sales | Transmission System Operator | Registered Network User | Private | Interactive | | No | document based: | Companies should be able to receive bulk transmission of their | The key issue is to ensure that a formal, |
| 1 | | | | 1 | 1 | | | | | | interactive | secondary market information in | ensure that a formal, harmonised, data format |
| | | 3.3.2 | 651 | 1 | | | | | | | may be | order to be able to align these | and content is defined |
| | | | | 1 | | | | | | | used as a secondary | with the internal system | |
| | | | | 1 | | | | | | | approach | | |
| | | 3.3.3.3 | 282 | 1 | | | 1 | Recommendation - | | | | | |
| | | | | Nomination Authorisation | Registered Network User | Transmission System Operator | Private | Document Based | | Yes | | | |
| | | 3.4.1 | 338 338 | Nomination Nomination | Registered Network User Registered Network User | (Initiating) Transmission System Operator (Matching)Transmission System Operator | Private | Document Based Document Based | | Yes | | | - |
| | | | | | | | | | | | | | - |
| | | 3.4.1 3.4.1 | 347 | Forward single sided nomination | (Active) Transmission System Operator | (Passive) Transmission System Operator | Private | Document Based | <i>SNAASS</i> | Yes | | | |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.do | 3.4.1 00 3.4.1 | 347 354 | Forward single sided nomination Processed Quantities | (Active) Transmission System Operator (Initiating) Transmission System Operator | (Passive) Transmission System Operator (Matching)Transmission System Operator | Private | Document Based Document Based | 0000000 000000 | Yes | | | |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.do | 3.4.1 3.4.1 3.4.1 | 347 354 362 | Forward single sided nomination Processed Quantities Matching Results | (Active) Transmission System Operator (Initiating) Transmission System Operator (Matching)Transmission System Operator | (Passive) Transmission System Operator (Matching)Transmission System Operator (Initiating) Transmission System Operator | Private Private | Document Based Document Based | 8888899 888899 | Yes Yes | | | |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.do | 3.4.1 00 3.4.1 | 347 354 | Forward single sided nomination Processed Quantities Matchino Results Confirmation Notice | (Active) Transmission System Operator (Initiating) Transmission System Operator (Matchino)Transmission System Operator (Initiatino) Transmission System Operator | (Passive) Transmission System Operator (Matching)Transmission System Operator (Initiatino) Transmission System Operator Registered Network User | Private Private Private | Document Based | BNNNB | Yes Yes Yes | | | |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.do | 3.4.1 3.4.1 3.4.1 3.4.1 | 347 354 362 367 | Forward single sided nomination Processed Quantities Matching Results | (Active) Transmission System Operator (Initiating) Transmission System Operator (Matching)Transmission System Operator | (Passive) Transmission Svstem Operator (Matching)Transmission System Operator (Initiation) Transmission System Operator Registered Network User Registered Network User Registered Network User | Private Private Private Private | Document Based Document Based Document Based | 8888888 8888888 8888888 888888 888888 | Yes Yes Yes Yes Yes | | | |

| Date | 26-Sep | Author name | | E-mail / phone |
|------|--------|---------------------------|---|----------------|
| | | Company name/Organisation | British Gas Trading Limited / Centrica Energy | Post address |
| | | Date | | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

"Recommendation" is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not enforceable but is to be considered as a "recommendation" to encourage harmonisation, and are to be negotiated bilaterally on a case by case basis.

"Date of Publication" After a lead time of 12 months starting from the date of publication, the TSOs or parties "acting on behalf of TSOs" shall make the Common Data Exchange Solution available for use with their counter parties. (see also question on line 7 in the table below)

Derogations: In the case of Member States which are not connected to the interconnected EU network and hold a derogation (re Art 49 of directive 2009/73/EC), the Common Data Exchange Solution should be made available not later than the time of the establishment of the connection with the interconnected EU network (see also Art1 (2) Network code Interoperability)

Confidentiality: ENTSOG reserves the right to publish all of the individual responses to the public consultation (with exception of personal information) unless you indicate otherwise in the questionnaire.

| | | | | | | | | Common Data Exchange Solution | Date of | | Alternative | Comments / Rationale for an |
|-----------------------------------|---|----------|----------------------|---|------------------------------------|------------------------------------|------------|---------------------------------|-------------|----------|-------------|-----------------------------|
| | BRS | | Document Line Number | | From Party Role Value | To Party Role Value | lity Level | | Publication | YES / NO | proposal | alternative proposal |
| Confidentiality | Please indicate whether you would like any part | | | | | | | | | No | | |
| nplementation lead time | Do you agree with the proposed lead time of 12 months for new or changed versions of the Business Requirement Specifications and CNOTs? | | | | | | | | | Yes | | |
| Capacity Trading Processes | | 3.3.1.2 | 509 | | Network User | Transmission System Operator | | Recommendation - interactive | | Yes | | |
| | | 3.3.1.3 | 515 | Network User Registration to Auction Office | | | Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.4 | 522 | | Auction Office | | | Recommendation - interactive | | Yes | | |
| | | 3.3.1.5 | 531 | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | Yes | | |
| | | 3.3.1.6 | | | Auction Office | | Public | Interactive | 1/11/2016 | | | |
| | CAP0554_160412_BRS_CAM+CMP_V18.docx | 3.3.1.8 | 572 | | Registered Network User | | Private | Interactive | 1/11/2016 | | | |
| | | 3.3.1.9 | 578 | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | Yes | | |
| | | 3.3.1.11 | 590 | Aggregated Auction Results | Auction Office | All | Public | Interactive | 1/11/2016 | Yes | | |
| | | 3.3.1.12 | 601 | Surrendered Capacity Sold | Transmission System Operator | Registered Network User | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.3.1.14 | 614 | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | Yes | | |
| | | 3.3.1.15 | 626 | Allocate Reverse Auction Results | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | Yes | | |
| | | 3.3.2 | 643 | Secondary Market Sales | Registered Network User | Transmission System Operator | Private | Interactive | 1/11/2016 | Yes | | |
| | | 3.3.2 | 651 | Secondary Market Sales | Transmission System Operator | Registered Network User | Private | Interactive | 1/11/2016 | Yes | | |
| Nomination and Matching Processes | | 3.3.3.3 | 282 | Nomination Authorisation | Registered Network User | Transmission System Operator | Private | Recommendation - Document Based | 1 | Yes | | |
| | | 3.4.1 | 338 | Nomination | Registered Network User | (Initiating) Transmission Syster | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 | 338 | Nomination | Registered Network User | (Matching)Transmission Syster | Private | Document Based | 1/11/2016 | Yes | | |
| | 3AL0453_160412_BRS on nominations_V17.do | 3.4.1 | 347 | Forward single sided nomination | (Active) Transmission System Op | e (Passive) Transmission System | Private | Document Based | 1/11/2016 | Yes | | |
| | | . 3.4.1 | 354 | Processed Quantities | (Initiating) Transmission System 0 | O (Matching) Transmission Syster | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 | 362 | Matching Results | (Matching)Transmission System 0 | O (Initiating) Transmission Syster | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 | 367 | Confirmation Notice | (Initiating) Transmission System (| O Registered Network User | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 | 367 | Confirmation Notice | (Matching)Transmission System 0 | O Registered Network User | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 | 375 | Interruption Notice | (Initiating) Transmission System 0 | O Registered Network User | Private | Document Based | 1/11/2016 | Yes | | |
| | | 3.4.1 | 375 | Interruption Notice | (Matching)Transmission System 0 | Di Registered Network User | Private | Document Based | 1/11/2016 | Yes | | |

| Correary name/Organisation CATGAS ENERGIA. A Post address Date Date 3009/2016 | Date | Author name | | E-mail / phone |
|--|------|---------------------------|--------------------|----------------|
| Date 30/09/2016 | | Company name/Organisation | CATGAS ENERGIA, SA | Post address |
| | | Date | 30/09/2016 | |

The different common data exchange solutions shown in column I are defined in the Interoperability Network code Art 21.

hange Solution Date of Agree

Recommendation' is used in cases where communications are identified in the BRS document (business requirement specification) which are not explicitly part of the network code. As such the proposed solution is not enforceable but is to be considered as a 'recommendation' to encourage harmonisation, and are to be negotiated biliterally on a case by case basis.

Date of Publication After a lead time of 12 months starting from the date of publication, the TSOs or parties 'acting on behalf of TSOs' shall make the Common Data Exchange Solution available for use with their counter parties. (see also question on line 7 in the table below)

Perceptions: In the case of Member States which are not connected to the interconnected EU network and hold a derogation (in Ar44) of directive 2009/73/EC), the Common Data Exchange Solidon should be made available not later than the time of the establishment of the connection with the interconnected EU network (see also Art 2) Network code Interceptivally)

Confidentiality: ENTSOG reserves the right to publish all of the individual responses to the public consultation (with exception of personal information) unless you indicate otherwise in the questionnaire.

| Process Area Value | ans | Document Chapter | r Document Line Number | Information Flow | From Party Role Value | To Party Role Value | Confidential ity Level | Common Data Exchange Solution | Date of Publication | Agree YES / NO | Alternative proposal | Comments / Rationale for an alternative proposal |
|-----------------------------------|--|--------------------|-------------------------|--|---|---|---------------------------|----------------------------------|------------------------|-------------------|--|--|
| Confidentiality | Please indicate whether you would like any part of Do you acres with the proposed lead time of 12 m | the information p | rovided be kept confide | ential and be reported only in an aggregated n | nanner INKUTe7 | | | | | No | | |
| Renation lead onle | and you again that the proposed was tilled of 12 m | 3.3.1.2 | 509 | Network User Registration | Network User | Transmission System Opera | t: Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.3 3.3.1.4 | 515 522 | Network User Registration to Auction Offic Approved Network Users | e Network User Auction Office | Auction Office Registered Network User | Private | Recommendation - interactive | | Yes | | |
| | | 3.3.1.4 | 522 | Approved Network Users | Auction Office | Registered Network User | Private | Recommendation - interactive | | Yes | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.5 | 531 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 3.3.1.5 | 531 | | | | | | | | | harmonization with the utilization of Edig (8) formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Surrender Capacity Rights | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Intercoverability Network Code, provides a sufficient level of |
| | | 3.3.1.6 | 551 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edg 8s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility-which is important as what may be the best solution for one party may be different for a |
| | | | | Offered Capacity | Auction Office | Registered Network User | Public | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.8 | 572 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | | | | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Capacity Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | NO | Recommendation - Interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | 3.3.1.9 | 578 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edio Ris formats, and the imposition of a sindle common data exchange solution is not necessary and |
| | | 0.0.1.0 | 510 | | | | | | | | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Allocated Capacity | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | | | | | | | | | | | |
| | | 3.3.1.11 | 590 | | | | | | | | | harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| Capacity Trading Processes | CAP0554_160412_BRS_CAM+CMP_V18.docx | | | Aggregated Auction Results | Auction Office | All | Public | Interactive | 1/11/2016 | No | Recommendation - interactive | diferent user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | We cannot agree with me selection of Document based as this solution implies the implementation or in-SA- which would invoke adaptional costs for processes that in Spain are currently performed through solutions (100%) compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.3.1.12 | 601 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition |
| | | | | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Surrendered Capacity Sold | Transmission System Operator | Registered Network User | Private | Document Based | 1/11/2016 | No | | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | ourrendered capacity dold | manantission aysiem operator | regulation reason User | . Trvate | Document Dabieu | 1/11/2016 | 140 | Concernation Realization - Interactive | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations - we understand that the definition of the |
| | | 3.3.1.14 | 614 | | | | | | | | | common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 0.0.1.14 | 014 | | | | | | | | | harmonization with the utilization of Edig (8) formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Reverse Auction Bid | Registered Network User | Auction Office | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the |
| | | 3.3.1.15 | 626 | | | | | | | | | The common data exchange solutions provided by the article 21 of the Intercentations – we understand that we deministrict are common data exchange solutions provided by the article 21 of the Intercentations – we understand that we deministrict are harmonization with the utilization of Edg @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | 3.3.1.15 | 626 | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Allocate Reverse Auction Results | Auction Office | Registered Network User | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the interoperability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and |
| | | 3.3.2 | 643 | | | | | | | | | harmonization with the utilization of Edig @s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | Secondary Market Sales | Registered Network User | Transmission System Opera | t: Private | Interactive | 1/11/2016 | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | 3.3.2 | 651 | | | | | | | | | harmonization with the utilization of Edio B's formats and the imposition of a single common data exchange solution is not necessary and |
| | | | | Secondary Market Sales | Transmission System Operator | Registered Network User | Private | Interactive | 1/11/2016 | No | Recommendation - interactive | could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.3.3.3 | 282 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
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| | | | | Nomination Authorisation | Registered Network User | Transmission System Opera | t: Private | Recommendation - Document Based | | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | 3.4.1 | 338 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 338 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Nomination | Registered Network User | (Initiating) Transmission Syst | te Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | 3.4.1 | 338 | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code. Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition |
| | | 3.4.1 | 330 | | | | | | | | | of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | 3.4.1 | 347 | Nomination Forward single sided nomination | Registered Network User (Active) Transmission System Ope | (Matching)Transmission Svs | tr Private | Document Based Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | 3.4.1 | 354 | Processed Quantities | (Initiating) Transmission System O | c (Matching)Transmission Sys | te Private | Document Based Document Based | 1/11/2016 1/11/2016 | | | |
| 1 | | 3.4.1 | 362 | Matching Results | (Matching)Transmission System O | t (Initiating) Transmission Svs | te Private | Document Based | 1/11/2016 | | | |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| Nomination and Matching Processes | BAL0453_160412_BRS on nominations_V17.doc: | | | | | | | | | | | |
| | | 3.4.1 | 367 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOT's should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
| | | | | | | | | | | | | harmonization with the utilization of Edg@s formats , and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | | | | Confirmation Notice | (Initiating) Transmission System O | p Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed through solutions 100% compatible with the Interoperability Network Code |
| | | 3.4.1 | 367 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOT's should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
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| | | | | Confirmation Notice | (Matching)Transmission System O | c Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | could ensuingen and contents sourcent sourcent textbally-which is important as what may be the best sourcen for one party may be different for a different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
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| | | 3.4.1 | 375 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNVTs should be limited to recommendations – we understand that the definition of the common data exchange solutions in the CNVTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interoperability Network Code provides a sufficient level of |
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| | | | | Interruption Notice | (Initiating) Transmission System O | Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | could encanger the current solution texicity- which is important as what may be the best solution for one party may be different for a different user. |
| | | | | | | | | | | | | We cannot agree with the selection of Document Based as this solution implies the implementation of AS4, which would involve additional |
| | | | | | | | | | | | | costs for processes that in Spain are currently performed that and solution to the superior and the superior |
| | | 3.4.1 | 375 | | | | | | | | | Besides, the Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common data exchange solutions provided by the article 21 of the Interopenability Network Code provides a sufficient level of harmonization with the utilization of Edig@s formats , and the imposition of a single common data exchange solution is not necessary and |
| | | | | | | | | | | | | harmonization with the utilization of Edig@s formats, and the imposition of a single common data exchange solution is not necessary and could endanger the current solution flexibility- which is important as what may be the best solution for one party may be different for a |
| | l | | | Interruption Notice | (Matching)Transmission System O | Registered Network User | Private | Document Based | 1/11/2016 | No | Recommendation - interactive | different user. |
| | | | | | | | | | | | | |