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

ENTSOG System Operations

Image Courtesy of Thyssengas

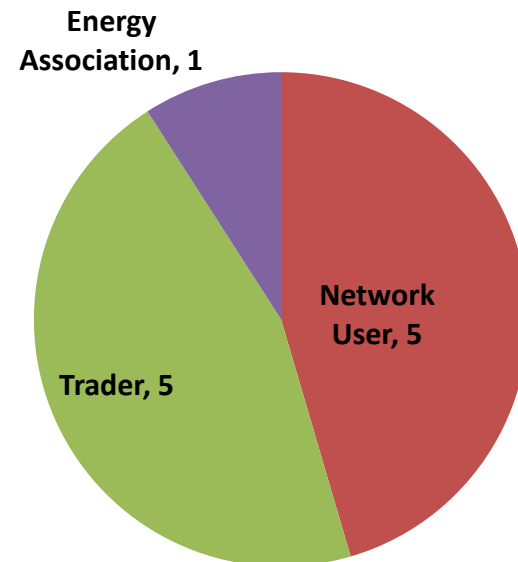# Results of CNOT public consultation September 2016

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

Pie chart with segments: Energy Association, 1; Network User, 5; Trader, 5

Results of CNOT public consultation September 2016

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

No Answer 27%

No 18%

Yes 55%
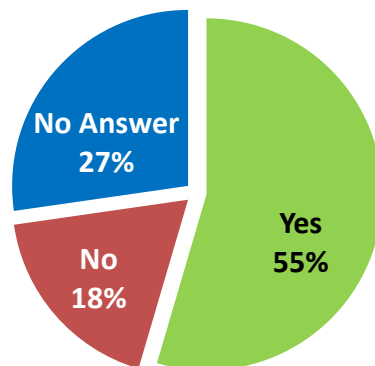
Do you agree with the common data exchange solution proposals?

Overall CAM/CMP BRS

*No Answer 4%

No 31%

Yes + Yes Recomm 65%

Overall NOM & MAT BRS

*No Answer 13%

No 26%

Yes + Yes Recomm 61%
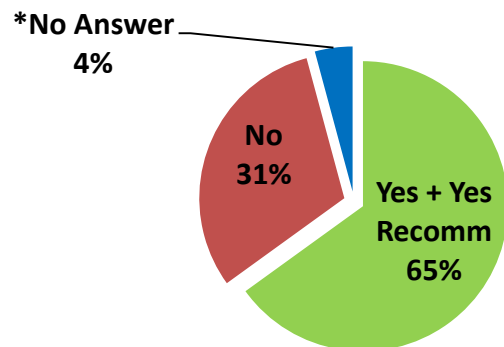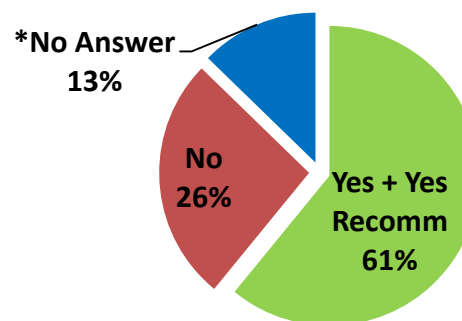
(*) The No Answers are related to data exchanges that are either not part of the regulation or data exchanges where the respondent is not involved.

CAM/CMP Data Exchanges Reponses
Do you agree with the proposed common data exchange solution?
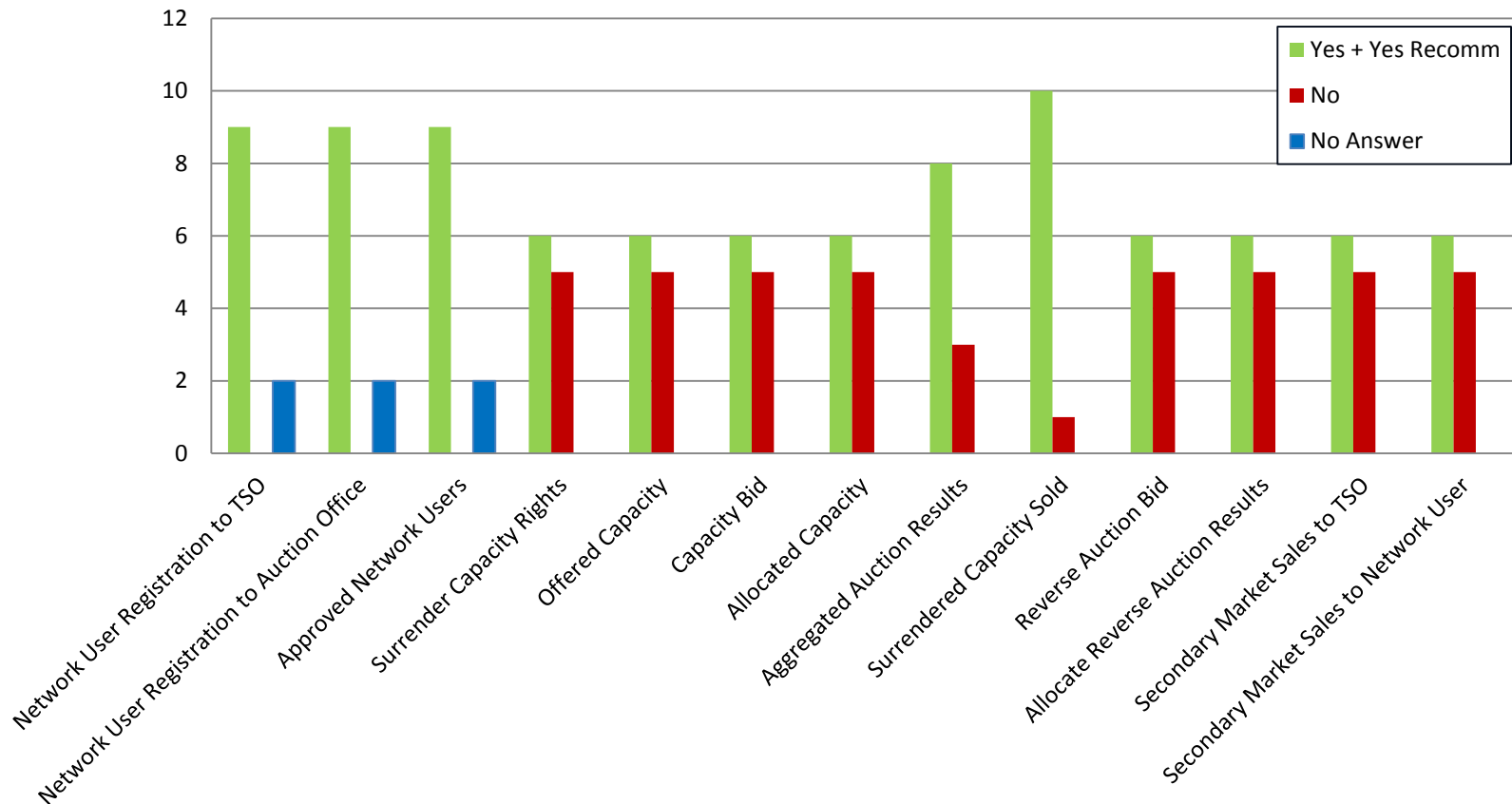
Votes for CAM/CMP Data Exchange Solutions
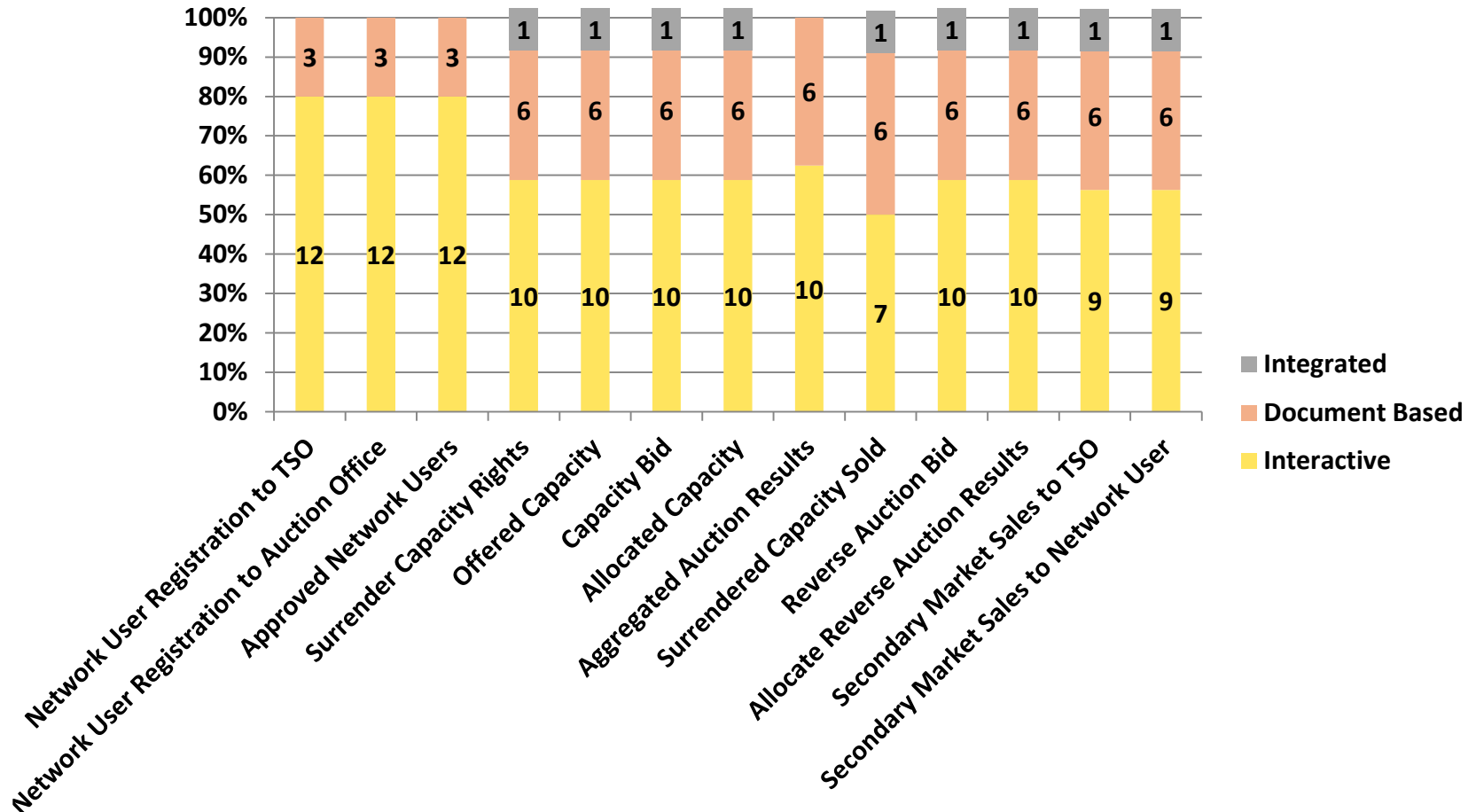
Some parties indicated multiple votes for each data exchange solutions without preference for which would be the first choice. Therefore the sum of votes is higher than the number of participants.

Overall NOM/MAT Data Exchanges
Do you agree with the proposed common data exchange solution?
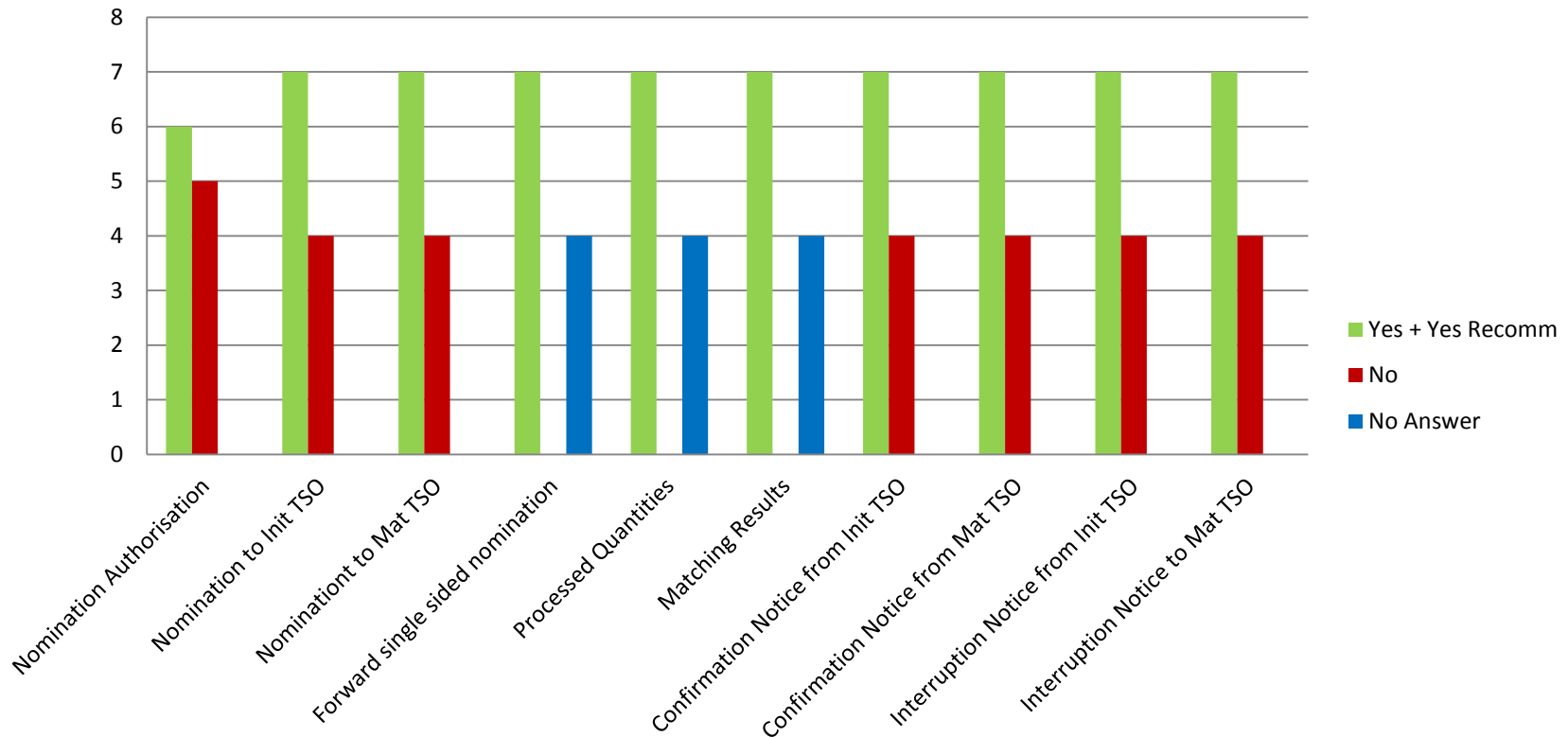
The "No Answers" are related to data exchanges where the respondents are not involved.

Votes for NOM/MAT Data Exchanges
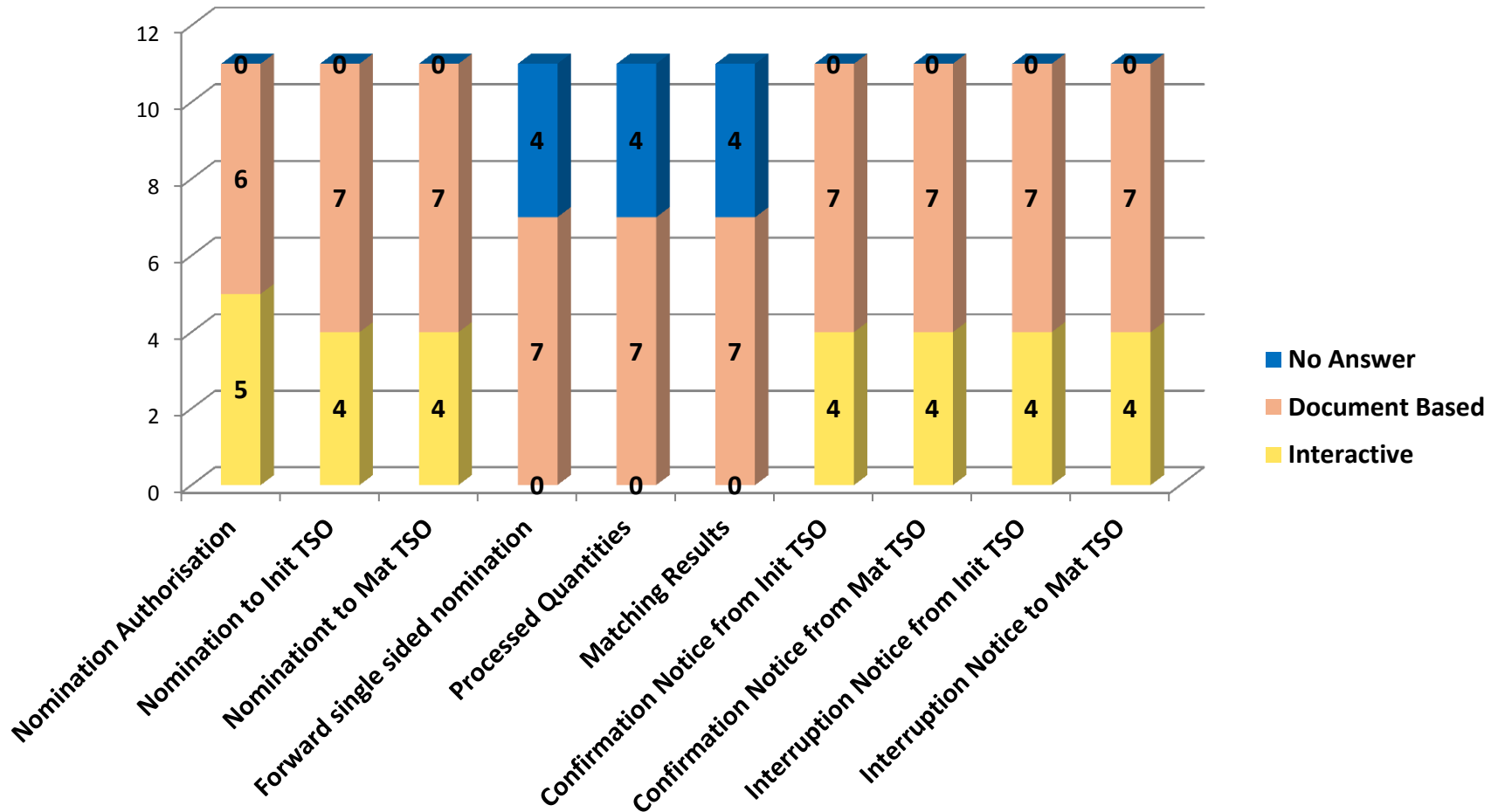
The "No Answers" are related to data exchanges where the respondents are not involved.

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?

No Answer 27%

No 18%

Yes 55%
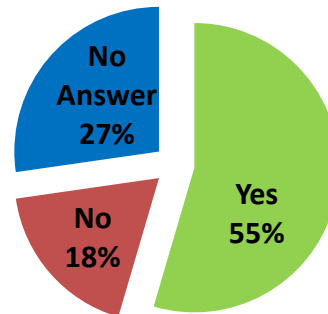
Alternative Proposals:
- *6 Months (1 Vote)*
- *Adapt timeline to beginning of 2018 and exceptional usage of AS2 in different countries (1 Vote)*

Key Findings

- *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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Annex:

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

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.

Process Area Value	BRS	Document Chapter	Document Line Number	Information Flow	From Party Role Value	To Party Role Value	Confidentiality 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 the information provided be kept confidential and be reported only in an aggregated manner									No		
Implementation 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		
		3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive		Yes		
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive		Yes		
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	Recommendation - interactive		Yes		
		3.3.1.5	531	Surrender Capacity Rights	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.6	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.9	578	Allocated Capacity	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.11	590	Aggregated Auction Results	Auction Office	All	Public	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
Capacity Trading Processes	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.12	601	Surrendered Capacity Sold	Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.3.1.14	614	Reverse Auction Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.15	626	Allocate Reverse Auction Results	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.2	643	Secondary Market Sales	Registered Network User	Transmission System Operator	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.2	651	Secondary Market Sales	Transmission System Operator	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common 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 different user.
		3.3.3.3	282	Nomination Authorisation	Registered Network User	Transmission System Operator	Private	Recommendation - Document Based		No	Recommendation - interactive	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 of the common data exchange solutions provided by the article 21 of 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 different user.
		3.4.1	338	Nomination	Registered Network User	(Initiating) Transmission System	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	338	Nomination	Registered Network User	(Matching)Transmission System	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	347	Forward single sided nomination	(Active) Transmission System Oper	(Passive) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	354	Processed Quantities	(Initiating) Transmission System O	(Matching) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	362	Matching Results	(Matching)Transmission System O	(Initiating) Transmission System	Private	Document Based	1/11/2016			
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.docx	3.4.1	367	Confirmation Notice	(Initiating) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	367	Confirmation Notice	(Matching)Transmission System O	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	375	Interruption Notice	(Initiating) Transmission System O	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	375	Interruption Notice	(Matching)Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.

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

Process Area Value	BRS	Document Chapter	Document Line Number	Information Flow	From Party Role Value	To Party Role Value	Confidentiality 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 the information provided be kept confidential and be reported only in an aggregated manner									No		
Implementation 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	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive		Yes		Vattenfall welcomes the opportunity to comment on the Common Data Exchange Proposals. Overall, we agree with the proposed solutions and the proposal to harmonise data exchange between the parties concerned at European level. This is to the benefit of Vattenfall as it decreases the administrative and financial burden that related to having different data exchanges in place.
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive		Yes		
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	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	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	1/11/2016	Yes		
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	Yes		
		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 - Document Based	1/11/2016	Yes		
		3.3.3.3	282	Nomination Authorisation	Registered Network User	Transmission System Operator	Private	Recommendation - Document Based		Yes		We would like to highlight that interactive solutions must be delivered with robustness and performance in mind, as well as possibilities to connect via automated process interfaces.
		3.4.1	338	Nomination	Registered Network User	(Initiating) Transmission System Operator	Private	Document Based	1/11/2016	Yes		
		3.4.1	338	Nomination	Registered Network User	(Matching)Transmission System Operator	Private	Document Based	1/11/2016	Yes		
		3.4.1	347	Forward single sided nomination	(Active) Transmission System Oper.	(Passive) Transmission System Operator	Private	Document Based	1/11/2016	Yes		
		3.4.1	354	Processed Quantities	(Initiating) Transmission System Op	(Matching)Transmission System Operator	Private	Document Based	1/11/2016	Yes		
		3.4.1	362	Matching Results	(Matching)Transmission System Op	(Initiating) Transmission System Operator	Private	Document Based	1/11/2016	Yes		
		3.4.1	367	Confirmation Notice	(Initiating) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		Based on our experience we would like to stress that in spite of common data exchange solutions, document based solutions must be considered as a fall-back 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.
		3.4.1	367	Confirmation Notice	(Matching)Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.docx	3.4.1	375	Interruption Notice	(Initiating) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	375	Interruption Notice	(Matching)Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	375									

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"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:
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Process Area Value	BRS	Document Chapter	Document Line Number	Information Flow	From Party Role Value	To Party Role Value	Confidentiality 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 the information provided be kept confidential and be reported only in an aggregated manner											
Implementation 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?											
		3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive		Yes		
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive		Yes		
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	Recommendation - interactive		Yes		
		3.3.1.5	531	Surrender Capacity Rights	Registered Network User	Auction Office	Private	Interactive	1/11/2016	NO	Document Based	We should have the possibility to submit from our system capacity that could be surrendered. It ensures that there is no divergence with their backend system. This is also coherent with the reply which is document based (line 16). The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.6	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	1/11/2016	NO	Document Based	Shippers should have the possibility to download the offered capacity in a standard data format in order to be able to process different possibilities and costs. In particular if there are many interconnection points that have to be evaluated for the period in question. This could involve a high volume of information which is not suited to an interactive solution. Interactive is against a harmonization.
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	NO	Document Based	Even if most companies do not have support for the bidding process yet ENTSOG should choose a formal, harmonised data format where the content is defined and choose an option for the future. To set interactive as common data solution is not harmonising anything. NU's should have the possibility to submit bids 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 prone and not possible to guarantee backend system and bid coherence).
		3.3.1.9	578	Allocated Capacity	Auction Office	Registered Network User	Private	Interactive	1/11/2016	NO	Document Based	Shippers want the ability to receive bulk transmission of their allocations in order to be able to align these with the internal system. When many auctions is 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 could involve a high volume of information which is not suited to an interactive solution. Choosing document based will reduce the risk of manual errors.
		3.3.1.11	590	Aggregated Auction Results	Auction Office	All	Public	Interactive	1/11/2016	NO	Document Based	According to article 17 of the EU CAM this should also be delivered as soon as possible between bidding rounds. To make this interactive will lead to manual work for NU's
		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	No	Document Based	The key issue is to ensure that a formal, harmonised, data format and content 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. If ENTSOG choose Interactive they place the gas business many years behind other areas of business.
		3.3.1.15	626	Allocate Reverse Auction Results	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Document Based	The key issue is to ensure that a formal, harmonised, data format and content 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	643	Secondary Market Sales	Registered Network User	Transmission System Operator	Private	Interactive	1/11/2016	No	Document Based	The key issue is to ensure that a formal, harmonised, data format and content 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.
Capacity Trading Processes	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.2	651	Secondary Market Sales	Transmission System Operator	Registered Network User	Private	Interactive	1/11/2016	No	Document Based	The key issue is to ensure that a formal, harmonised, data format and content 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.
		3.3.3.3	282	Nomination Authorisation	Registered Network User	Transmission System Operator	Private	Recommendation - Document Based	1/11/2016	Yes		
		3.4.1	338	Nomination	Registered Network User	(Initiating) Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	338	Nomination	Registered Network User	(Matching) Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	347	Forward single sided nomination	(Active) Transmission System Oper	(Passive) Transmission System	Private	Document Based	1/11/2016	Yes		
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.docx	3.4.1	354	Processed Quantities	(Initiating) Transmission System Or	(Matching) Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	362	Matching Results	(Matching) Transmission System Op	(Initiating) Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	367	Confirmation Notice	(Initiating) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	367	Confirmation Notice	(Matching) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	375	Interruption Notice	(Initiating) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	375	Interruption Notice	(Matching) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	Yes		

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.

Process Area Value	BRS	Document Chapter	Document Line Number	Information Flow	From Party Role Value	To Party Role Value	Confidentiality 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 the information provided be kept confidential and be reported only in an aggregated manner									No		
Implementation 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		
		3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive		Yes		
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive		Yes		
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	Recommendation - interactive		Yes		
		3.3.1.5	531	Surrender Capacity Rights	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.6	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.9	578	Allocated Capacity	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
Capacity Trading Processes	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.11	590	Aggregated Auction Results	Auction Office	All	Public	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.12	601	Surrendered Capacity Sold	Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.3.1.14	614	Reverse Auction Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.15	626	Allocate Reverse Auction Results	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.2	643	Secondary Market Sales	Registered Network User	Transmission System Operator	Private	Interactive	1/11/2016	No	Recommendation - interactive	The Common Data Exchange Solutions in the CNOTs should be limited to recommendations – we understand that the definition of the common 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 different user.
		3.3.2	651	Secondary Market Sales	Transmission System Operator	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.3.3.3	282	Nomination Authorisation	Registered Network User	Transmission System Operator	Private	Recommendation - Document Based		No	Recommendation - interactive	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 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 different user.
		3.4.1	338	Nomination	Registered Network User	(Initiating) Transmission System	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	338	Nomination	Registered Network User	(Matching)Transmission System	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.docx	3.4.1	347	Forward single sided nomination	(Active) Transmission System Oper	(Passive) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	354	Processed Quantities	(Initiating) Transmission System Oper	(Matching) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	362	Matching Results	(Matching)Transmission System Oper	(Initiating) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	367	Confirmation Notice	(Initiating) Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	367	Confirmation Notice	(Matching)Transmission System Oc	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	375	Interruption Notice	(Initiating) Transmission System Oc	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	375	Interruption Notice	(Matching)Transmission System Op	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.

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)

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Process Area Value	BRS	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	Please indicate whether you would like any part of the information provided be kept confidential and be reported only in an aggregated manner												
Implementation 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?												
		3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive					
		3.3.1.3	515	Network User Registration to	Network User	Auction Office	Private	Recommendation - interactive					
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	Recommendation - interactive					
		3.3.1.5	531	Surrender Capacity Rights	Registered Network User	Auction Office	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit from thier system capacity that could be surrendered. It ensures that there is no divergence with their backend system. This is also coherent with the reply which is document based (line 16).	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.6	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to download the offered capacity in a standard data format in order to be able to process different possibilities. In particular if there are many interconnection points that have to be evaluated for the period in question. This could involve a high volume of information which is not suited to an interactive solution.	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit bids 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 prone and not possible to guarantee backend system and	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.9	578	Allocated Capacity	Auction Office	Registered Network User	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive bulk transmission of their allocations in order to be able to align these with the internal system. This could involve a high volume of information which is not suited to an interactive solution and reduce the risk of manual errors.	The key issue is to ensure that a formal, harmonised, data format and content is defined
Capacity Trading Processes	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.11	590	Aggregated Auction Results	Auction Office	All	Public	Interactive	#######	No	document based; interactive may be used as a secondary	Companies should be able to receive the entire contents of an auction in order to be able to carry out internal analysis in their system	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.12	601	Surrendered Capacity Sold	Transmission System Ope	Registered Network User	Private	Document Based	#######	Yes			
		3.3.1.14	614	Reverse Auction Bid	Registered Network User	Auction Office	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit bids from their system in order to ensure that there is no difference between the system content and the bid content. Interactive is error prone and not possible to guarantee backend system and bid coherence.	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.15	626	Allocate Reverse Auction Re	Auction Office	Registered Network User	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive bulk transmission of their allocations in order to be able to align these with the internal system	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.2	643	Secondary Market Sales	Registered Network User	Transmission System Operator	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit secondary market information from thier system in order to ensure that there is no difference between the backend system content and the transmitted information content	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.2	651	Secondary Market Sales	Transmission System Ope	Registered Network User	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive bulk transmission of their secondary market information in order to be able to align these with the internal system	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.3.3	282	Nomination Authorisation	Registered Network User	Transmission System Operator	Private	Recommendation - Document	Yes				
		3.4.1	338	Nomination	Registered Network User	(Initiating) Transmission Syste	Private	Document Based	#######	Yes			
		3.4.1	338	Nomination	Registered Network User	(Matching) Transmission Syste	Private	Document Based	#######	Yes			
		3.4.1	347	Forward single sided nomina	(Active) Transmission Syst	(Passive) Transmission System	Private	Document Based	#######	Yes			
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.docx	3.4.1	354	Processed Quantities	(Initiating) Transmission S	(Matching) Transmission Syste	Private	Document Based	#######	Yes			
		3.4.1	362	Matching Results	(Matching) Transmission S	(Initiating) Transmission Syste	Private	Document Based	#######	Yes			
		3.4.1	367	Confirmation Notice	(Initiating) Transmission S	Registered Network User	Private	Document Based	#######	Yes			
		3.4.1	367	Confirmation Notice	(Matching) Transmission S	Registered Network User	Private	Document Based	#######	Yes			
		3.4.1	375	Interruption Notice	(Initiating) Transmission S	Registered Network User	Private	Document Based	#######	Yes			
		3.4.1	375	Interruption Notice	(Matching) Transmission S	Registered Network User	Private	Document Based	#######	Yes			

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)

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Process Area Value	BRS	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	Please indicate whether you would like any part of the information provided be kept confidential and be reported only in an aggregated manner												
Implementation 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?												
		3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive					
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive					
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	Recommendation - interactive					
		3.3.1.5	531	Surrender Capacity Rights	Registered Network User	Auction Office	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit from thier system capacity that could be surrendered. It ensures that there is no divergence with their backend system. This is also coherent with the reply which is document based (line 16).	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.6	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to download the offered capacity in a standard data format in order to be able to process different possibilities. In particular if there are many interconnection points that have to be evaluated for the period in question. This could involve a high volume of information which is not suited to an interactive solution.	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit bids 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 prone and not possible to guarentee backend system and	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.9	578	Allocated Capacity	Auction Office	Registered Network User	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive bulk transmission of their allocations in order to be able to align these with the internal system. This could involve a high volume of information which is not suited to an interactive solution and reduce the risk of manual errors.	The key issue is to ensure that a formal, harmonised, data format and content is defined
Capacity Trading Processes	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.11	590	Aggregated Auction Results	Auction Office	All	Public	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive the entire contents of an auction in order to be able to carry out internal analysis in their system	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.12	601	Surrendered Capacity Sold	Transmission System Operator	Registered Network User	Private	Document Based	#######	Yes			
		3.3.1.14	614	Reverse Auction Bid	Registered Network User	Auction Office	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit bids from their system in order to ensure that there is no difference between the system content and the bid content. Interactive is error prone and not possible to guarentee backend system and bid coherence.	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.1.15	626	Allocate Reverse Auction Results	Auction Office	Registered Network User	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive bulk transmission of their allocations in order to be able to align these with the internal system	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.2	643	Secondary Market Sales	Registered Network User	Transmission System Operator	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should have the possibility to submit secondary market information from thier system in order to ensure that there is no difference between the backend system content and the transmitted information content	The key issue is to ensure that a formal, harmonised, data format and content is defined
		3.3.2	651	Secondary Market Sales	Transmission System Operator	Registered Network User	Private	Interactive	#######	No	document based; interactive may be used as a secondary approach	Companies should be able to receive bulk transmission of their secondary market information in order to be able to align these with the internal system	The key issue is to ensure that a formal, harmonised, data format and content is defined
		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	#######	Yes			
		3.4.1	338	Nomination	Registered Network User	(Matching)Transmission System Operator	Private	Document Based	#######	Yes			
		3.4.1	347	Forward single sided nomination	(Active) Transmission System Operator	(Passive) Transmission System Operator	Private	Document Based	#######	Yes			
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.doc	3.4.1	354	Processed Quantities	(Initiating) Transmission System Operator	(Matching)Transmission System Operator	Private	Document Based	#######	Yes			
		3.4.1	362	Matching Results	(Matching)Transmission System Operator	(Initiating) Transmission System Operator	Private	Document Based	#######	Yes			
		3.4.1	367	Confirmation Notice	(Initiating) Transmission System Operator	Registered Network User	Private	Document Based	#######	Yes			
		3.4.1	367	Confirmation Notice	(Matching)Transmission System Operator	Registered Network User	Private	Document Based	#######	Yes			
		3.4.1	375	Interruption Notice	(Initiating) Transmission System Operator	Registered Network User	Private	Document Based	#######	Yes			
		3.4.1	375	Interruption Notice	(Matching)Transmission System Operator	Registered Network User	Private	Document Based	#######	Yes			

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

Process Area Value	BRS	Document Chapter	Document Line Number	Information Flow	From Party Role Value	To Party Role Value	Confidentiality 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 the information provided be kept confidential and be reported only in an aggregated manner									No		
Implementation 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	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive		Yes		
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive		Yes		
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	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	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	1/11/2016	Yes		
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	Yes		
		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	BAL0453_160412_BRS on nominations_V17.docx	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	Private	Document Based	1/11/2016	Yes		
		3.4.1	338	Nomination	Registered Network User	(Matching)Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	347	Forward single sided nomination	(Active) Transmission System Operator	(Passive) Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	354	Processed Quantities	(Initiating) Transmission System Operator	(Matching)Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	362	Matching Results	(Matching)Transmission System Operator	(Initiating) Transmission System	Private	Document Based	1/11/2016	Yes		
		3.4.1	367	Confirmation Notice	(Initiating) Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	367	Confirmation Notice	(Matching)Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	375	Interruption Notice	(Initiating) Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	Yes		
		3.4.1	375	Interruption Notice	(Matching)Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	Yes		

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.

Process Area Value	BRS	Document Chapter	Document Line Number	Information Flow	From Party Role Value	To Party Role Value	Confidentiality 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 the information provided be kept confidential and be reported only in an aggregated manner									No		
Implementation 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		
		3.3.1.2	509	Network User Registration	Network User	Transmission System Operator	Private	Recommendation - interactive		Yes		
		3.3.1.3	515	Network User Registration to Auction Office	Network User	Auction Office	Private	Recommendation - interactive		Yes		
		3.3.1.4	522	Approved Network Users	Auction Office	Registered Network User	Private	Recommendation - interactive		Yes		
		3.3.1.5	531	Surrender Capacity Rights	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.6	551	Offered Capacity	Auction Office	Registered Network User	Public	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.8	572	Capacity Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.9	578	Allocated Capacity	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
Capacity Trading Processes	CAP0554_160412_BRS_CAM+CMP_V18.docx	3.3.1.11	590	Aggregated Auction Results	Auction Office	All	Public	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.12	601	Surrendered Capacity Sold	Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.3.1.14	614	Reverse Auction Bid	Registered Network User	Auction Office	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.1.15	626	Allocate Reverse Auction Results	Auction Office	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.2	643	Secondary Market Sales	Registered Network User	Transmission System Operator	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.2	651	Secondary Market Sales	Transmission System Operator	Registered Network User	Private	Interactive	1/11/2016	No	Recommendation - interactive	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 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.
		3.3.3.3	282	Nomination Authorisation	Registered Network User	Transmission System Operator	Private	Recommendation - Document Based		No	Recommendation - interactive	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 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 different user.
		3.4.1	338	Nomination	Registered Network User	(Initiating) Transmission System	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	338	Nomination	Registered Network User	(Matching) Transmission System	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	347	Forward single sided nomination	(Active) Transmission System Operator	(Passive) Transmission System	Private	Document Based	1/11/2016			
Nomination and Matching Processes	BAL0453_160412_BRS on nominations_V17.docx	3.4.1	354	Processed Quantities	(Initiating) Transmission System Operator	(Matching) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	362	Matching Results	(Matching) Transmission System Operator	(Initiating) Transmission System	Private	Document Based	1/11/2016			
		3.4.1	367	Confirmation Notice	(Initiating) Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	367	Confirmation Notice	(Matching) Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	375	Interruption Notice	(Initiating) Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.
		3.4.1	375	Interruption Notice	(Matching) Transmission System Operator	Registered Network User	Private	Document Based	1/11/2016	No	Recommendation - interactive	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 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 different user.