



European Union Agency for the Cooperation  
of Energy Regulators

# *Enabling short-term gas markets after interim balancing measures:*

## *European Union Agency Report on the implementation of the Balancing Network Code*

VOLUME II: COUNTRY ASSESSMENTS

FOURTH EDITION

REVISED VERSION 1.1

LINK TO CORRIGENDUM:

[https://www.acer.europa.eu/Official\\_documents/Acts\\_of\\_the\\_Agency/Publications%20Annexes/ACER%20Report%20on%20enabling%20short-term%20gas%20markets%20after%20interim%20balancing%20measures/Corrigendum\\_BAL\\_IMR\\_2020.pdf](https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Publications%20Annexes/ACER%20Report%20on%20enabling%20short-term%20gas%20markets%20after%20interim%20balancing%20measures/Corrigendum_BAL_IMR_2020.pdf)

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## Balancing zones' assessments

This volume hosts a detailed standardised regulatory assessment for all balancing zones analysed in volume I of this Report. The analysis mostly relies on NRAs' self-assessments. The Agency has tried to verify the correctness and consistency of the information provided, but cannot exclude misreporting.

### A. Balancing zones that terminated all interim measures

DE - Germany (Net Connect Germany ('NCG') and Gaspool ('GPL'))

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, terminated</b>	The formal approval for the use of the balancing platform ('BP') expired on 19 April 2019.  By 1 January 2018, GPL and NCG terminated the use of the locational commodity products on the balancing platform. Therefore, the application of interim measures (usage of a BP) ended on that date.
<b>Trade notification enabled</b>	<b>Yes</b>	VTP effectively enables trade notifications.
<b>Trade notifications processed within x mins</b>	<b>30</b>	30 minutes time for processing a transaction.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	IP renominations are in place to enable DA nominations and renominations WD.
<b>Info requirements - system status</b>	<b>Yes</b>	NCG provides for both aggregate imbalances of all network users and linepack information (as of June 2016) with an hourly frequency, which is welcomed by the Agency: <a href="https://www.net-connect-germany.de/en-gb/Transparency-information/Aggregate-Imbalance-Position">https://www.net-connect-germany.de/en-gb/Transparency-information/Aggregate-Imbalance-Position</a> <a href="https://www.net-connect-germany.de/en-gb/Transparency-information/Linepack">https://www.net-connect-germany.de/en-gb/Transparency-information/Linepack</a>  GPL provides the aggregate imbalances of all network users and no information on linepack: <a href="http://www.gaspool.de/no_cache/en/publications/aggregated-balancing-status/">http://www.gaspool.de/no_cache/en/publications/aggregated-balancing-status/</a>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	Satisfying specifications of the Code, Article 32(2). NCG and GPL provide good quality information in a timely manner.  NCG: <a href="https://www.net-connect-germany.de/en-gb/Information/Balancing-Gas-Supplier/Publications/External-Balancing-Activities">https://www.net-connect-germany.de/en-gb/Information/Balancing-Gas-Supplier/Publications/External-Balancing-Activities</a>  GPL: <a href="http://www.gaspool.de/en/services/balancing-energy/utilization-of-control-energy/commodity/">http://www.gaspool.de/en/services/balancing-energy/utilization-of-control-energy/commodity/</a>

<b>Info requirements - network user portfolio</b>	<b>Yes</b>	<p>The variant 2 model is applied, with distribution system operators ('DSOs') as forecasting party.</p> <p>As requested by Article 38 of the Code, GPL and NCG carried out a cost-benefit analysis on the information provision arrangements:</p> <ul style="list-style-type: none"> <li>Report to the NRA, published on 1 October 2018 (in German):  <a href="https://www.gaspool.de/fileadmin/download/konsultationen/konsultation_0110/20181001_Kosten-Nutzen-Analyse.pdf">https://www.gaspool.de/fileadmin/download/konsultationen/konsultation_0110/20181001_Kosten-Nutzen-Analyse.pdf</a></li> <li>Management summary (in English):  <a href="https://www.gaspool.de/fileadmin/download/konsultationen/konsultation_1805/Cost-benefit-analysis.pdf">https://www.gaspool.de/fileadmin/download/konsultationen/konsultation_1805/Cost-benefit-analysis.pdf</a></li> </ul> <p>Following the CBA results, BNetzA performed an analysis to identify TSOs with an inadequate performance with regard to information provision with the aim to improve the data quality. During the process, the respective network operators presented individual measures and schedules for an improvement of their data quality performance.</p> <p>Considering the 2019 analysis, BNetzA intends to repeat the analysis in 2020 with a broader scope.</p>
<b>Trading Platform</b>	<b>Available and used</b>	<p>NCG:  <a href="https://www.net-connect-germany.de/en-gb/Information/Balancing-Gas-Supplier/Publications/External-Balancing-Activities">https://www.net-connect-germany.de/en-gb/Information/Balancing-Gas-Supplier/Publications/External-Balancing-Activities</a></p> <p>GPL:  <a href="http://www.gaspool.de/en/services/balancing-energy/utilization-of-control-energy/commodity/">http://www.gaspool.de/en/services/balancing-energy/utilization-of-control-energy/commodity/</a></p>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	The merit order evolved since the initial implementation date.
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	-
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	MAMs use the global title products by default. If, for technical reasons, the balancing gas has to be delivered in a specific gas quality, MAMs use quality-specific title products.
<b>TSO uses Balancing Platform</b>	<b>No</b>	Not in use as of January 2018. NRA's permission to use BP expired by April 2019.
<b>TSO uses balancing services</b>	<b>Yes</b>	Minimal use. The MAMs predominantly use STSPs. In GY 18/19, balancing services covered 1,4% of the total balancing gas volumes in the Gaspool market area and 0,03% in the NCG market area.
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>NCG and GPL publish the information required by Article 9(4) of the Code:</p> <p><a href="https://www.net-connect-germany.de/en-gb/Information/Balancing-Gas-Supplier/Publications/External-Balancing-Activities">https://www.net-connect-germany.de/en-gb/Information/Balancing-Gas-Supplier/Publications/External-Balancing-Activities</a></p>

		<a href="http://www.gaspool.de/en/services/balancing-energy/utilization-of-control-energy/commodity/">http://www.gaspool.de/en/services/balancing-energy/utilization-of-control-energy/commodity/</a>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	The daily imbalances are cashed-out fully at the end of the day.
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	The cash-out formula considers global title and quality-specific title products trades.  The locational system/point-specific products do not enter the daily cash-out price.
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Minimal</b>	2% of the weighted average price.
<b>Neutrality fully implemented</b>	<b>Yes</b>	Neutrality pots for intra-day metered ('IDM') and non-daily metered ('NDM') users are separated.  Between 1 October 2018 and 1 October 2019, the neutrality charges levied by NCG are set at 0.60 EUR/MWh for IDM and 1.20 EUR/MWh for NDM.  Those levied by Gaspool are set at 0.26 EUR/MWh for IDM and 0.73 EUR/MWh for NDM.
<b>Within-day Obligations</b>	<b>Limited</b>	Balancing portfolio within-day obligations ('WDOs') apply. The system introduced in October 2016, and still in place, foresees that for IDM customers, for each hour of the gas day, a tolerance of 7.5% of the daily offtake quantity is allowed. Within-day, charges are only levied when the MAM acts on both sides of the market (global title products buy and sell) and these trades generate costs for the MAM.  The respective flexibility balancing quantities, costs, and charges are published by NCG and GPL on a daily basis: <a href="https://www.net-connect-germany.de/en-gb/Transparency-information/Prices/Flexibility-charge">https://www.net-connect-germany.de/en-gb/Transparency-information/Prices/Flexibility-charge</a> <a href="https://www.gaspool.de/en/services/balancing-group-manager/compensation-energy/within-day-obligation/">https://www.gaspool.de/en/services/balancing-group-manager/compensation-energy/within-day-obligation/</a>  In the GY 18/20, WDOs are invoked 36 days on NCG and 2 days on GPL.  Within-day imbalance volumes are carried forward throughout the gas day and cashed-out at the end of the gas day.
<b>Application of interim measures</b>	<b>Terminated</b>	The NRA approved the use of the BP until April 2019. Since, its limited use, the instrument was terminated by January 2018.

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, terminated</b>	Lithuania announced to adopt an interim regime after the deadlines foreseen by the Code, Article 46(3).
<b>Trade notification enabled</b>	<b>Yes</b>	VTP effectively enables trade notifications.
<b>Trade notifications processed within x mins</b>	<b>30</b>	30 minutes at most.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Partial</b>	The renomination cycles have been properly designed and implemented.  Restrictions to renominations, deviating from the Code, exist for the users transiting gas to the Russian Federation (Kaliningrad).
<b>Info requirements - system status</b>	<b>Yes</b>	Satisfying specifications of Article 32(1) of the Code: <a href="https://www.ambergrid.lt/en/services/balancing/rules-of-balancing">https://www.ambergrid.lt/en/services/balancing/rules-of-balancing</a>  The TSO publishes the system imbalance position and forecast: <a href="https://www.ambergrid.lt/en/services/balancing/inbalancing">https://www.ambergrid.lt/en/services/balancing/inbalancing</a>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	Following article 51 of the national balancing code <sup>1</sup> on TSO transparency regarding balancing actions, Amber Grid publishes ex-post monthly summary statistics on its website: <a href="https://www.ambergrid.lt/en/services/balancing/balancing-actions">https://www.ambergrid.lt/en/services/balancing/balancing-actions</a>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	Satisfying Article 32(3) of the Code, network users can access this information in their dedicated area of the Amber Grid's website, as foreseen in paragraph 31 of the national balancing code: <a href="https://www.ambergrid.lt/en/transportation-services/balancing/rules-of-balancing">https://www.ambergrid.lt/en/transportation-services/balancing/rules-of-balancing</a>
<b>Trading Platform available and used by the TSO</b>	<b>Available and used</b>	The GET Baltic gas exchange ( <a href="https://www.getbaltic.com/en/">https://www.getbaltic.com/en/</a> ) is selected as the trading platform according to paragraph 14 of the national balancing code.
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	STSPs (only title) are defined and available.
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	The TSO buys 69% of balancing gas on the trading platform based on the data for the GY 18/19. The TSO, in 7 out of the 12 months of the GY, procured around 100% of gas through the trading platform.

<sup>1</sup> Approved by the Lithuanian NRA's (NCC) decision of 24 August 2018 No O3E-263, available at: <https://www.ambergrid.lt/en/services/balancing/rules-of-balancing>

<b>TSO uses title product as primary tool</b>	<b>Yes</b>	-
<b>TSO uses Balancing Platform</b>	<b>No</b>	A balancing platform was never used.
<b>TSO makes use of balancing services</b>	<b>Yes</b>	In GY 18/19, balancing services represented 31% percent of the TSO's balancing volume.
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>Based on Article 51 of the national balancing code, Amber Grid publishes summary ex-post monthly statistics on its website:  <a href="https://www.ambergrid.it/en/services/balancing/balancing-actions">https://www.ambergrid.it/en/services/balancing/balancing-actions</a></p> <p>The publication occurs monthly, as the price of balancing services is cleared only after the end of the month.</p>
<b>Full daily cash-out implemented</b>	<b>No</b>	<p>Daily cash-out is not fully implemented due to the possibility to trade a product that allows networks users to exchange their imbalance position after the end of gas day, both on over-the-counter ('OTC') and on the exchange.</p> <p>Following the NRA's request, the TSO stated it could not provide the information on how much daily imbalance is cleared using this product. The NRA estimates that, since the overall imbalance volume of network users is very low, the majority of network users' imbalance volume is adjusted by using the previous day product.</p>
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	<p>As of 1 December 2018, the imbalance charge is based only on STSPs (title DA and WD) offered on the trading platform.</p> <p>The values of the imbalance charge are published and updated after each transaction on:  <a href="https://www.getbaltic.com/en/market-data/prices-of-balancing-gas/">https://www.getbaltic.com/en/market-data/prices-of-balancing-gas/</a></p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Large</b>	10%
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>Annex I, paragraph 2, of the TSO's balancing code foresees that the balancing activity of the TSO is neutral.</p> <p>The new version of the NRA's methodology on setting the TSO's revenue cap, paragraph 46, foresees that the neutrality fee shall be separated starting from 1 January 2020. The TSO publishes neutrality information to network users on a monthly basis in their invoices for transmission services.</p> <p><a href="https://www.e-tar.it/portal/it/legalAct/2fd91460c89811e8bf37fd1541d65f38">https://www.e-tar.it/portal/it/legalAct/2fd91460c89811e8bf37fd1541d65f38</a></p> <p>The NRA intends to check how the TSO derives the market-based value of the neutrality fee.</p>
<b>Within-day Obligations</b>	<b>None</b>	-

<b>Application of interim measures</b>	<b>Terminated</b>	<p>Tolerances, previously adopted as an interim measure, were abolished since 1 April 2019, based on paragraph 59 of the new version of the national Code approved by the NRA on 24 August 2018.</p> <p><a href="https://www.ambergrid.lt/en/services/balancing/rules-of-balancing">https://www.ambergrid.lt/en/services/balancing/rules-of-balancing</a></p> <p>NRA decision (in Lithuanian):  <a href="https://www.e-tar.lt/portal/lt/legalAct/435af730a79911e8acb39f2e6db7935b">https://www.e-tar.lt/portal/lt/legalAct/435af730a79911e8acb39f2e6db7935b</a></p> <p>The last interim measure report was approved by the NRA decision No O3E-187 of 31 May 2018 (in Lithuanian):  <a href="https://www.regula.lt/Docs/nutarimas_2018_187_visas.pdf#search=laikin%C5%B3j%C5%B3%20priemoni%C5%B3">https://www.regula.lt/Docs/nutarimas_2018_187_visas.pdf#search=laikin%C5%B3j%C5%B3%20priemoni%C5%B3</a></p>
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Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, terminated</b>	A detailed regime has been developed according to the requirements of the Code. The interim measures were removed on 1 April 2019.
<b>Trade notification enabled</b>	<b>Yes</b>	The TSO has enabled a trade notification facility. Network users can submit day-ahead and within-day trades.
<b>Trade notifications processed within x mins</b>	<b>120</b>	The TSO uses a tool similar to the one used for physical nomination/renomination approval. Therefore, the processing time is maximum 120 minutes.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	<p>IP renominations and processes are in place. The renomination cycles start at 16:00 hours of gas day D-1 and end at 3:00 hours of gas day D.</p> <p>(See Chapter 15.3 on renomination processes.)</p> <p><a href="https://en.gaz-system.pl/strefa-klienta/iriesp/instrukcja-ruchu-i-eksploatacji-sieci-przesylowej/">https://en.gaz-system.pl/strefa-klienta/iriesp/instrukcja-ruchu-i-eksploatacji-sieci-przesylowej/</a></p>
<b>Info requirements - system status</b>	<b>Yes</b>	<p>The TSO publishes the aggregate imbalance position of all users:</p> <p><a href="http://en.gaz-system.pl/strefa-klienta/system-przesylowy/tsotransparencytemplate/">http://en.gaz-system.pl/strefa-klienta/system-przesylowy/tsotransparencytemplate/</a></p> <p>The aggregated imbalances are updated hourly.</p> <p>Linepack information is not provided.</p>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	<p>The NRA confirms that the relevant costs and revenues of the activities connected with balancing are published on a monthly and yearly basis:</p> <ul style="list-style-type: none"> <li>Monthly summary: <a href="http://en.gaz-system.pl/strefa-klienta/taryfa/bilansowanie/mechanizm-zapewnienia-neutralnosci-kosztowej/">http://en.gaz-system.pl/strefa-klienta/taryfa/bilansowanie/mechanizm-zapewnienia-neutralnosci-kosztowej/</a></li> <li>Yearly summary: <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/">http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/</a></li> </ul>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	<p>The DSO Polska Spółka Gazownictwa sp. z o.o. is responsible for NDM forecasts from 1 September 2016 and published the document: "Methodology of forecasting of NDM off-takes by network users".</p> <p>In September 2018, Polska Spółka Gazownictwa published also a report on the accuracy of the forecast of a network user's NDM off-take.</p> <p>Link to both documents (in Polish only):</p> <p><a href="http://www.psgaz.pl/prognozowanie-ilosci-odbieranych-przez-zud">http://www.psgaz.pl/prognozowanie-ilosci-odbieranych-przez-zud</a></p>
<b>Trading Platform available and used by the TSO</b>	<b>Available and used by the TSO</b>	The TP is used as the primary tool, with most usage occurring for WD products, but DA is also available. WD in day market on the TGE trading platform opens at 8:00 hours and closes at 15:30 hours. The DA market on the TGE opens at 9:00 hours and closes at 15:30 hours.

		<p>Moreover, based on the decision of the President of URE, the TSO can use the German TP European Energy Exchange ('EEX') or the TP in the Czech Republic ('OTE') to balance the high calorific balancing zone. This option can be used in two situations:</p> <ul style="list-style-type: none"> <li>• When the Polish TP cannot be used because of unavailability or insufficient liquidity;</li> <li>• When there is a need to use locational products at the border of balancing zones with Germany or the Czech Republic, or at the point between the Yamal transit zone and the high/calorific zone.</li> </ul>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	Title STSPs are defined and available.
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	The TSO uses the TP predominantly. The TP does not yet offer the possibility to trade locational products.
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	The TSO uses the title market predominantly.
<b>TSO uses Balancing Platform</b>	<b>No</b>	-
<b>TSO makes use of balancing services</b>	<b>Yes</b>	Minimal use. Specific balancing services have been contracted at the Branice IP, at the border with the Czech Republic. In GY 18/19, balancing services covered 0.16% of TSO's total balancing actions' cost.
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>The publications are available on a monthly and yearly basis:</p> <p><a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/">http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/</a></p> <p><a href="http://en.gaz-system.pl/strefa-klienta/taryfa/bilansowanie/mechanizm-zapewnienia-neutralnosci-kosztowej/">http://en.gaz-system.pl/strefa-klienta/taryfa/bilansowanie/mechanizm-zapewnienia-neutralnosci-kosztowej/</a></p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	The full cash-out model is implemented.
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	Only prices from the WD trades enter the cash-out price formula <sup>2</sup> .

<sup>2</sup> In the low-methane balancing zone, the rule is the same. However, since no trade has taken place there since the establishment of the VTP, in March 2016, the price is set based on a default rule allowed by Article 22(4) of the Code.

Until the first non-zero value of the TGE<sub>glw</sub> index is published, CRGL<sub>w</sub> is used instead of CSRBL<sub>w</sub> for the purpose of KCKL<sub>w</sub> or KCSL<sub>w</sub> determination.

Reference Gas Price (CRG) - the weighted average price of the purchase of gaseous fuel by the TSO in the gas month preceding the month when the CRG is to be published. The price shall apply in the month following the month in which it was published on the TSO's website. The CRG shall be determined for the quantity expressed in kWh separately for high-methane gas balancing area (CRG<sub>E</sub>) and low-methane gas balancing area (CRGL<sub>w</sub>).

<b>Small adjustment to deliver marginal cash-out price</b>	<b>Large</b>	The small adjustment represents 10% of the weighted average price, which is based on the WD exchange price index.
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>Neutrality costs and redistributions are calculated based on a methodology that is compliant with the Code. Neutrality is separated from transmission charges.</p> <p>Invoices contain:</p> <ol style="list-style-type: none"> <li>1. The neutrality rate applied in a given settlement period;</li> <li>2. The total volume of gaseous fuel transported by the network user in the settlement period.</li> </ol> <p>The neutrality charge as from the beginning of GY 16/17 is set on a monthly basis.</p> <p>A new neutrality mechanism has been introduced as from January 2019.</p> <p>Monthly neutrality reports are available at:  <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/mechanism-for-assuring-cost-neutrality/">http://en.gaz-system.pl/customer-zone/tariff/balancing/mechanism-for-assuring-cost-neutrality/</a></p> <p>The methodology for the neutrality calculation is available at:  <a href="https://en.gaz-system.pl/fileadmin/pliki/taryfa/en/Mechanism_ensuring_cost_neutrality_of_balancing_measures.pdf">https://en.gaz-system.pl/fileadmin/pliki/taryfa/en/Mechanism_ensuring_cost_neutrality_of_balancing_measures.pdf</a></p> <p>Neutrality fee rate:  <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/neutrality-fee-rate/">http://en.gaz-system.pl/customer-zone/tariff/balancing/neutrality-fee-rate/</a></p>
<b>Within-day Obligations</b>	<b>None</b>	-
<b>Application of interim measures</b>	<b>Terminated</b>	All interim measures (tolerances, balancing platform, and interim imbalance charge – the latter was used only in the low-calorific national zone) have been removed as of 1 April 2019.

PL - Poland Transit Gas Pipeline System ('TGPS') Yamal-Western Europe

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, terminated</b>	The interim measures have been removed as from 1 April 2019.
<b>Trade notification enabled</b>	<b>Yes</b>	The TSO has enabled a Trade Notification facility. Network users can submit DA trade notifications only.  This is independent from the interface associated with the TGE Platform (see opening hours of TGE below).
<b>Trade notifications processed within x mins</b>	<b>120</b>	The TSO uses similar functionality to the one used for physical nomination/renomination approval and the time for processing is 120 minutes.
<b>IP renominations enabled</b>  (choice: renomination flexibility at the broader set of points)	<b>Yes</b>	IP re-nominations and processes are in place. The re-nomination cycles start at 16:00 hours of gas day D-1 and end at 3:00 hours on gas day D: <a href="https://en.gaz-system.pl/fileadmin/pliki/sgt/pl/2019-03-29_GAZ-SYSTEM_IRiESP_SGT_zatwierdzona_EN.pdf">https://en.gaz-system.pl/fileadmin/pliki/sgt/pl/2019-03-29_GAZ-SYSTEM_IRiESP_SGT_zatwierdzona_EN.pdf</a>  (see Chapter 12.3 on renomination processes)  All information about long-term historical contracts is confidential. The Agency could not verify if contractual obligations create tighter requirements, nor the NRA could be more specific.
<b>Info requirements - system status</b>	<b>Yes</b>	The TSO publishes the aggregate imbalance position of all users: <a href="http://en.gaz-system.pl/en/customer-zone/transit-yamal-pipeline/tsotransparencytemplate0/">http://en.gaz-system.pl/en/customer-zone/transit-yamal-pipeline/tsotransparencytemplate0/</a>
<b>Info requirements – TSO balancing actions</b>	<b>Yes</b>	No balancing action took place in GY 18/19.  The NRA confirms that the relevant costs and revenues of the activities connected with balancing are published on a monthly and yearly basis: <ul style="list-style-type: none"><li>Monthly summary: <a href="http://en.gaz-system.pl/strefa-klienta/taryfa/bilansowanie/mechanizm-zapewnienia-neutralnosci-kosztowej/">http://en.gaz-system.pl/strefa-klienta/taryfa/bilansowanie/mechanizm-zapewnienia-neutralnosci-kosztowej/</a></li><li>Yearly summary: <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/">http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/</a></li></ul>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	There are no non-daily metered off-takes in this zone. The zone does not have many access points and the network users know their balancing portfolios. All the points in the network link this balancing area with other transmission systems.
<b>Trading Platform available and used by the TSO</b>	<b>Not used</b>	As for the high-calorific zone, TGE provides the TP.  The trading platform has never been used: <a href="https://www.tge.pl/gaz-rdn">https://www.tge.pl/gaz-rdn</a>  Moreover the TSO can use the German TP European Energy Exchange ('EEX') or TP in the Czech Republic ('OTE'). This option can be used in two situations:

		<ul style="list-style-type: none"> <li>When the TP cannot be used because of unavailability or insufficient trade);</li> <li>When there is a need to use locational products at the border of balancing zones with Germany or the Czech Republic, or at the point between the Yamal transit zone and the high calorific zone.</li> </ul>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	<p>A DA product is defined. The product allows exchanging the title of gas, via the VTP, between two portfolios within the TGPS.</p> <p>Trading is available only from 9:00 hours to 15:30 hours.</p> <p>The product was never traded.</p>
<b>TSO uses Trading Platform as first gas source</b>	<b>No</b>	The national code foresees the use of the TP, but it was never used, as the system balances itself physically at all times.
<b>TSO uses title product as primary tool</b>	<b>No</b>	The national code prescribes the title product as primary tool, but it was never used, as the system was never out of balance.
<b>TSO uses Balancing Platform</b>	<b>No</b>	-
<b>TSO makes use of balancing services</b>	<b>No</b>	The TSO has not used balancing services in the TGPS.
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>A yearly summary of the costs is available at:  <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/">http://en.gaz-system.pl/customer-zone/tariff/balancing/balancing-actions-nc-bal/</a></p> <p>The TGPS has had no balancing action, hence no cost so far.</p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	The full cash-out model is implemented, yet never applied.
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	<p>Only prices from the WD trades enter the cash-out price formula<sup>3</sup>.</p> <p>For the moment, no network user was exposed to the imbalance prices.</p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Large</b>	10%

<sup>3</sup> Until the intraday market starts on TGE for SGT balancing area (RDBSGT) and until the first transaction is concluded there, the TGEsgtDA index is taken as the CSRBSGT. If TGEsgtDA index equals 0, the CSRB for the high-methane gas E type for a given gas day in accordance with the provisions of the Transmission Network Code (TNC) is taken as CSRBSGT.

Average Balancing Settlement Price (CSRBE) in the high-methane gas balancing area - volume-weighted average price from all transactions of TGE session of the Intraday Market (RDBG), related to the present gas day, as published on the TSO's website and on the website of Towarowa Gielda Energii with index name TGEgasID - for the high-methane gas E type balancing area. In case of no publication of the TGEgasID index, the last published value of TGEgasID is taken as the CSRBE.

<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>Neutrality costs and redistributions are calculated based on a methodology that is compliant with the Code. Neutrality is separated from transmission charges.</p> <p>Invoices contain:</p> <ol style="list-style-type: none"> <li>1. The neutrality rate applied in a given settlement period;</li> <li>2. The total volume of gaseous fuel, transported by the network user in the settlement period.</li> </ol> <p>The new neutrality mechanism was introduced in 2019.</p> <p>Monthly neutrality reports are available at:  <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/mechanism-for-assuring-cost-neutrality/">http://en.gaz-system.pl/customer-zone/tariff/balancing/mechanism-for-assuring-cost-neutrality/</a></p> <p>The methodology for the neutrality calculation is available at:  <a href="https://en.gaz-system.pl/fileadmin/pliki/taryfa/en/Mechanism_ensuring_cost_neutrality_of_balancing_measures.pdf">https://en.gaz-system.pl/fileadmin/pliki/taryfa/en/Mechanism_ensuring_cost_neutrality_of_balancing_measures.pdf</a></p> <p>Due to the fact that there are no network users' imbalances nor TSO's actions, there are no credit nor debit attributable to neutrality:  <a href="http://en.gaz-system.pl/customer-zone/tariff/balancing/neutrality-fee-rate/">http://en.gaz-system.pl/customer-zone/tariff/balancing/neutrality-fee-rate/</a></p>
<b>Within-day Obligations</b>	<b>None</b>	-
<b>Application of interim measures</b>	<b>Terminated</b>	<p>All interim measures (balancing platform and interim imbalance charge) have been removed as from 1 April 2019. The interim measures were never used.</p>

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, terminated</b>	<p>The proposed arrangements do not apply to the full network: the Romanian system connecting Ukraine and Bulgaria is not covered.</p> <p>The NRA reports that the Code is fully implemented since 1 October 2018: E-E regime, VTP, daily balancing and gas day are implemented according to "The Network Code for the National Gas Transmission System" ('RNC')":  <a href="https://www.transgaz.ro/ro/despre-noi/legislatie/#codul_retelei">https://www.transgaz.ro/ro/despre-noi/legislatie/#codul_retelei</a></p>
<b>Trade notification enabled</b>	<b>Yes</b>	Trade notifications can be submitted independent of network users' physical flows.
<b>Trade notifications processed within x mins</b>	<b>30</b>	Trade notifications are processed in 30 minutes as referred to in Article 17.7 (2) of the RNC.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	Nomination and re-nomination are fully implemented as referred to in Article 49 and 56 of the RNC.
<b>Info requirements - system status</b>	<b>Yes</b>	<p>The linepack information is regularly updated.</p> <ul style="list-style-type: none"> <li>Linepack:  <a href="http://www.transgaz.ro/index.php/en/clients/operational-data/line-pack">http://www.transgaz.ro/index.php/en/clients/operational-data/line-pack</a></li> <li>Intraday linepack:  <a href="http://www.transgaz.ro/en/line-pack-intraday">http://www.transgaz.ro/en/line-pack-intraday</a></li> </ul> <p>Network users' daily imbalance is published at:  <a href="http://transgaz.ro/en/clients/operational-data/neutralty-account-nu-daily-imbalances">http://transgaz.ro/en/clients/operational-data/neutralty-account-nu-daily-imbalances</a></p>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	<p>Details of each balancing action are published:  <a href="http://www.transgaz.ro/en/clients/operational-data/balancing-actions-ots">http://www.transgaz.ro/en/clients/operational-data/balancing-actions-ots</a></p>
<b>Info requirements - network user portfolio</b>	<b>No</b>	The implementation of non-daily metered off-takes forecast has not yet been performed according to Article 36 on BAL NC.
<b>Trading Platform available and used by the TSO</b>	<b>Available and partly used</b>	<p>There are four licensed operators: two of them (BRM and OPCOM) are active and meet the requirements of a TP.</p> <p>OPCOM: <a href="https://www.opcom.ro/pp/home.php">https://www.opcom.ro/pp/home.php</a></p> <p>BRM: <a href="http://www.brm.ro/">http://www.brm.ro/</a></p> <p>The statistics on the OPCOM TP website for DA and WD trades do not show trades. The Agency cannot therefore verify how effectively has the OPCOM TP been used.</p>

		<p>The other two operators are S.C. Humintrade S.R.L. and S.C. Tradex Platform S.R.L. They also have a license to operate the centralized gas market and are in the process of implementing trading software.</p> <p>A high share of initial network users' imbalance activity is cleared in a restricted market at a capped price and not exposed to the cash-out prices of the trading platforms according to the Code, as explained in Volume I, paragraph (48) of this Report.</p>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	<p>STSPs are defined as referred to in Article 2 of ANRE's Order no. 105/2018.</p> <p>STSPs are available on BRM and OPCOM trading platforms:</p> <ul style="list-style-type: none"> <li>• <a href="http://dayaheadgas.brm.ro/pub_home/ring.do?l=ro">http://dayaheadgas.brm.ro/pub_home/ring.do?l=ro</a></li> <li>• <a href="https://www.opcom.ro/rapoarte/pzugn/raport_pzugn19.php?lang=ro">https://www.opcom.ro/rapoarte/pzugn/raport_pzugn19.php?lang=ro</a></li> </ul>
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	The tools that Transgaz can use for balancing are defined, as referred to in Article 83.2 (2) and (3) of the RNC.
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	Balancing is ensured through title STSPs. The same title products are sold in the two operational platforms.
<b>TSO uses Balancing Platform</b>	<b>No</b>	Trading platforms are used instead.
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>Balancing is mostly ensured through STSPs since September 2018 (via OPCOM) and October 2018 (via BRM).</p> <p>Yet, there is a possibility for the TSO to procure balancing resources through storages (18% of total TSO's balancing volumes in GY 18/19).</p>
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>The information is published under "Neutrality account value" section:  <a href="https://www.transgaz.ro/en/clients/operational-data/neutrality-account-nu-daily-imbalances">https://www.transgaz.ro/en/clients/operational-data/neutrality-account-nu-daily-imbalances</a></p> <p>The TSO publishes the balancing costs:  <a href="http://www.transgaz.ro/en/clients/operational-data/balancing-actions-ots">http://www.transgaz.ro/en/clients/operational-data/balancing-actions-ots</a></p> <p>Information on trades is also available on the TPs' websites:  <a href="http://dayaheadgas.brm.ro/pub_home/activQuoteMonthly.do">http://dayaheadgas.brm.ro/pub_home/activQuoteMonthly.do</a>  <a href="http://echilibrare.brm.ro/pub_home/activQuote.do?l=ro">http://echilibrare.brm.ro/pub_home/activQuote.do?l=ro</a></p>
<b>Full daily cash-out implemented</b>	<b>No</b>	<p>Users have adequate tools (renominations, GMOIS information platform).</p> <p>Network users receive information twice per day from the TSO through the GMOIS platform, at 11:30 hours and 19:30 hours, as referred to in Article 57.3 (4) of the RNC.</p> <p>The TSO is the forecasting party.</p> <p>A high share of initial network users' imbalance activity is cleared in a restricted market at a capped price and not</p>



		exposed to the cash-out prices of the trading platforms according to the Code, as explained in Volume I, paragraph (48) of this Report.
<b>Cash-out prices set using TP trades</b>	<b>No</b>	<p>Only a limited share of imbalances are settled at the cash-out prices are based on trades on the TPs.</p> <p><a href="http://transgaz.ro/en/clients/operational-data/weighted-average-price-calculation-dailymonthly">http://transgaz.ro/en/clients/operational-data/weighted-average-price-calculation-dailymonthly</a></p> <p>Basic enablers of the balancing market are established as referred to in Article 102, 102.1 and 102.2 of the RNC.</p> <p>A high share of initial network users' imbalance activity is cleared in a restricted market at a capped price and not exposed to the cash-out prices of the trading platforms according to the Code, as explained in Volume I, paragraph (48) of this Report.</p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Large</b>	10%
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>According to ANRE, neutrality is fully implemented (see ANRE's Order 85/2018).</p> <p>The value of the neutrality account is apportioned to the users at the end of each settlement period, based on the neutrality rate determined.</p> <p>The neutrality rates paid by or to the users are proportional to the quantity of natural gas transported during the settlement period by each user.</p>
<b>Within-day Obligations</b>	<b>None</b>	
<b>Application of interim measures</b>	<b>Terminated</b>	All interim measures previously in place (tolerances, interim imbalance price – even though not all imbalance volumes are exposed to the cash out price, and alternative to a balancing platform) have been terminated by 1 October 2018.

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, terminated</b>	With the implementation of a joint balancing zone ('JBZ') with Denmark, as of 1 April 2019 Sweden has ended all interim measures.
<b>Trade notification enabled</b>	<b>Yes</b>	Swedegas confirms that trade notifications have been implemented.
<b>Trade notifications processed within x mins</b>	<b>30</b>	The balancing area manager ('BAM') confirms trade notifications within 30 minutes.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	There is no longer an IP for renominations between the Swedish and Danish networks, nominations are applied directly to the Swedish consumption, production, and storage.
<b>Info requirements - system status</b>	<b>Yes</b>	<p>The aggregated position (estimated system commercial balance, 'ESCB') of all network users in the system is published every hour.</p> <p>The final position (system commercial balance, 'SCB') is published at the end of every gas day.</p> <p><a href="http://online.energinet.dk/data/Pages/System-Commercial-Balance.aspx?gasday=22-10-2019">http://online.energinet.dk/data/Pages/System-Commercial-Balance.aspx?gasday=22-10-2019</a></p>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	<p>Handled by the BAM, notifications are sent via email to all network users and balance administrators<sup>4</sup>:</p> <p><a href="https://www.ediel.se/Portal/PartyList/PartyList/ViewGasMarketParties">https://www.ediel.se/Portal/PartyList/PartyList/ViewGasMarketParties</a></p>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	The base case information model is used. Network users get an update on their balancing portfolio through IDM-reporting five times per day. The TSO also supplies a NDM forecast.
<b>Trading Platform available and used by the TSO</b>	<b>Yes</b>	<p>The BAM uses the Exchange Transfer Facility ('ETF') on Pegas (formerly Gaspoint Nordic) for balancing trades at specified times WD, if there is a need for balancing actions, and announces if there is a desire to trade the hours ahead.</p> <p>Network users can also use the Gas Transfer Facility ('GTF') provided by the BAM for bilateral trade.</p>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	<p>The ETF offers title WD products.</p> <p><a href="https://www.powernext.com/sites/default/files/download_center_files/ETF_0.pdf">https://www.powernext.com/sites/default/files/download_center_files/ETF_0.pdf</a></p>

<sup>4</sup> Requirements to become a balancing administrator are listed at:  
[https://www.swedegas.com/Our\\_services/system\\_responsibility/balance\\_responsibility/becoming\\_a\\_balancing\\_administrator](https://www.swedegas.com/Our_services/system_responsibility/balance_responsibility/becoming_a_balancing_administrator)

<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	All TSO's trading actions take place on the ETF.
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	Title WD is the only product defined.
<b>TSO uses Balancing Platform</b>	<b>No</b>	
<b>TSO makes use of balancing services</b>	<b>No</b>	
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>The BAM publishes cash-out prices daily and provides summary information at network users' fora four times per year.</p> <p>Information available at:  <a href="http://online.energinet.dk/data/Pages/System-Commercial-Balance.aspx?gasday=01-02-2020">http://online.energinet.dk/data/Pages/System-Commercial-Balance.aspx?gasday=01-02-2020</a></p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	Imbalances are cleared daily.
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	Prices are set based on the BAM trades or, in case the BAM does not trade because the system is sufficiently balanced, on the neutral gas price available at the ETF + small adjustment.
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Minimal to moderate</b>	<p>A dual system of small adjustments is in place:</p> <ul style="list-style-type: none"> <li>• 0,5% within the published balancing bands;</li> <li>• and 3% if it is breached.</li> </ul> <p>The balancing band is published and updated daily and varies with system operation. During special circumstances, i.e. 'Early Warning' and other crisis levels, the small adjustment can be increased even further.</p>
<b>Neutrality fully implemented</b>	<b>No</b>	<p>The NRA indicates the following information source:  <a href="https://en.energinet.dk/Gas/Tariffs-and-Fees">https://en.energinet.dk/Gas/Tariffs-and-Fees</a></p> <p>Balancing neutrality in the JBZ is secured via the variable transmission charges in the Danish gas grid. The costs are shared proportionally between Energinet and Swedegas.</p>
<b>Within-day Obligations</b>	<b>No</b>	WDOs are under discussion for the new market model, to be potentially applied after 2022.
<b>Application of interim measures</b>	<b>Terminated</b>	Interim measures previously applied (weekly balancing trade and regulated gas traded) no longer apply as of 1 April 2019.

## B. Balancing zones that only kept tolerances

IE - Ireland

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, prolonged</b>	Tolerances have been prolonged.
<b>Trade notification enabled</b>	<b>Yes</b>	
<b>Trade notifications processed within x mins</b>	<b>30</b>	
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	
<b>Info requirements - system status</b>	<b>Yes</b>	Information such as the forecast end-of-day (EOD) shipper imbalance position is available, alongside other system related information: <a href="https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/">https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/</a>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	Information on balancing action volumes secured is available on the dashboard at the link above.
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	NDM processes have been long established in Ireland. The base case information provision is applied.  A description of the implementation model is detailed in Part E (Section 1.7) of the national Code: <a href="https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(BALANCING-AND-SHRINKAGE)-Version-5.01.pdf">https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(BALANCING-AND-SHRINKAGE)-Version-5.01.pdf</a>  Information available at: <a href="https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/">https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/</a>
<b>Trading Platform available and used by the TSO</b>	<b>Yes</b>	The TP went live on 1 October 2017. Energy Broking Ireland ('EBI') operates the it. <a href="https://www.marexspectron.com/">https://www.marexspectron.com/</a>  The TSO commenced trading for its balancing gas requirements in June 2018.  The list of Irish Balancing Point ('IBP') products (DA and WD) is visible to traders once there are logged in the trading platform website.

<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	The trading platform initially offered WD, DA, and weekend-ahead title products.
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	In June 2018 the TSO began using the TP, since then it has solely used the TP for balancing.
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	GNI has not used existing Balancing Gas Contracts for its balancing gas requirements since starting to trade on the platform in June 2018. It is likely that there will not be a tender for further contracts after the existing ones expire next year, but as of yet no formal decision has been made.
<b>TSO uses Balancing Platform</b>	<b>No</b>	No BP exists. The TSO proposed the implementation of a BP to the industry in June 2016. The industry showed no significant appetite for it.
<b>TSO makes use of balancing services</b>	<b>No</b>	The TSO has initially retained the balancing services contract, as the TP is new to Ireland. The idea being that the contract is retained until the TP displays sufficient liquidity to provide confidence that balancing services may no longer be necessary.  In June 2018, the TSO began using the TP, since then, it has sourced all its balancing gas requirements on the trading platform. It is likely that GNI will not seek further balancing gas contracts at the expiration of the existing contracts (end of 2020), but no formal decision has been made.
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	Information on balancing action costs is available on the dashboard: <a href="https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/">https://www.gasnetworks.ie/corporate/gas-regulation/transparency-and-publicat/dashboard-reporting/</a>
<b>Full daily cash-out implemented</b>	<b>No</b>	The full daily imbalance is cashed-out each day.  Tolerances apply at present. In April 2019, following stakeholders' (including ACER) feedback, most tolerances have been removed or decreased. The remaining tolerances will be reviewed in Q4 2019.  The tolerances are described in Section 1.7 of Part E of the Code of Operations: <a href="https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(Balancing-Shrinkage)-(final-clean)-Version-5.03-.pdf">https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(Balancing-Shrinkage)-(final-clean)-Version-5.03-.pdf</a>
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	The cash-out prices are set by reference to TP trades.
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Large</b>	It applies when the final daily imbalance quantity is greater than the shipper's portfolio tolerance for that day. The price a shipper receives for this gas is based on the system average price ('SAP') or system marginal price ('SMP'). They receive the lowest of: <ul style="list-style-type: none"> <li>• The IBP SAP * 3.5% (the 'small adjustment') or;</li> </ul>

		<ul style="list-style-type: none"> <li>The IBP SMP. The IBP SMP is either the lowest price received, or the highest price paid by the TSO for a market balancing transaction in a given day.</li> </ul>
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>Neutrality principles apply not only to balancing, but also to the costs of the provision of shrinkage gas<sup>5</sup>.</p> <p>Currently, a monthly settlement to network users from the disbursements account is in place. The methodology for the calculation of the neutrality charges are detailed in description of the implementation model in Part E (Article 30.2) of the Irish Code of Operations: <a href="https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(BALANCING-AND-SHRINKAGE)-Version-5.01.pdf">https://www.gasnetworks.ie/corporate/gas-regulation/service-for-suppliers/code-of-operations/PART-E-(BALANCING-AND-SHRINKAGE)-Version-5.01.pdf</a></p> <p>The CRU has decided that from GY 20/21 onwards shrinkage costs will be recovered through tariffs.</p>
<b>Within-day Obligations</b>	<b>None</b>	
<b>Application of interim measures</b>	<b>Prolonged</b>	<p>Tolerances have been reduced but still exist.</p> <p>The CRU has been collecting data on the efficiency of the tolerances and will soon commence a consultation with industry to assess the feasibility of removing the tolerances by October 2020, in time for the next gas year. The CRU expects to be able to remove the tolerances by that time, in the absence of evidence that doing so would detrimentally affect the gas market.</p>

<sup>5</sup> Shrinkage covers compressor fuel usage, calorific value losses, and unaccounted gas after measuring inputs and outputs of the system.

## C. Balancing zones that kept balancing platforms and interim charges

EL - Greece

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, prolonged</b>	Since 16 April 2019, the main interim measure still in force is the operation of the balancing platform, together with a related cash-out price. Extensive use of balancing services has still taken place in GY 18/19.
<b>Trade notification enabled</b>	<b>Yes</b>	The VTP is in place since 1 July 2018. Users exchange gas on the VTP by executing bilateral contracts. Traders also have access to the VTP, as long as they are listed as users. They are not obliged to book capacity, but they need to have an application for access to the VTP approved by the TSO. To do so, they need to provide a guarantee to the TSO.  <a href="https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/info1">https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/info1</a>
<b>Trade notifications processed within x mins</b>	<b>120</b>	Users who trade quantities at the VTP submit nominations (and renominations) to the TSO specifying their counterparty. The nominations of each pair of users must be equal; if not, lesser rule applies. The nominations are processed by the TSO within 120 minutes.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	The nomination and renomination regime specified in the Code is implemented at all pipeline and entry and exit points of the Greek network. Thirty-five consecutive hourly cycles of renominations at Sidirokastro, Kipi and all exit points (starting at 17:00 hours of the day before and ending at 4:00 hours of the day that they are referring to) and 13 cycles of renominations at Agia Triada (11 consecutive hourly cycles starting at 17:00 hours and ending at 4:00 hours of the gas day, one cycle from 4:00 hours the day before until 17:00 hours of the day they are referring to, and one more cycle from 17:00 hours until 20:00 hours of the same day).  At the IP Kulata (BG)/Sidirokastro (EL) the second version of the interconnection agreement between DESFA and Bulgartransgaz is in place since June 2017 to incorporate the option of renominations at the IP: <a href="https://www.desfa.gr/userfiles/pdf/DERY/TS/BusinessRules.pdf">https://www.desfa.gr/userfiles/pdf/DERY/TS/BusinessRules.pdf</a>
<b>Info requirements - system status</b>	<b>Yes</b>	Aggregate network imbalance and linepack values at the beginning of the gas day are provided for each day in volume unit. Linepack hourly prediction is displayed graphically: <a href="https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/linepack-calculation">https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/linepack-calculation</a>  Aggregate network imbalance forecast is not provided.
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	The information is available on the TSO's website. The relevant file is updated frequently (balancing services are reported daily). The market is aware of quantities of balancing gas exchanged on the BP and used within the balancing service contract, as well as the relevant unit price applied:

		<a href="https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/info1">https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/info1</a> <a href="https://www.desfa.gr/regulated-services/balancing/costs">https://www.desfa.gr/regulated-services/balancing/costs</a>
<b>Info requirements - network user portfolio</b>	<b>Partial</b>	Inputs and offtakes for each entry and exit point are provided historically on an hourly basis: <a href="http://www.xn--mxafd0dp.gr/scada/quantity-hourly.php?la=GR">http://www.xn--mxafd0dp.gr/scada/quantity-hourly.php?la=GR</a>
<b>Trading Platform available and used by the TSO</b>	<b>No</b>	Not established yet, in progress <sup>6</sup> .
<b>STSPs defined and available on Trading Platform</b>	<b>No</b>	The TSO uses title products (day ahead and within day) in order to buy or sell gas in the balancing platform.
<b>TSO uses Trading Platform as first gas source</b>	<b>No</b>	The TSO uses the balancing platform as first gas source.
<b>TSO uses title product as primary tool</b>	<b>Partial</b>	Yes, but on the balancing platform.
<b>TSO uses Balancing Platform</b>	<b>Yes</b>	The TSO uses the balancing platform since 1 July 2018.
<b>TSO makes use of balancing services</b>	<b>Yes</b>	Since the operation of the BP, the use of balancing service has decreased.  Balancing services have been implemented since 2009 according to Article 8 of the Code. The procurement of balancing services is based on the provisions of the annual balancing plan: approved by RAE: <a href="https://www.desfa.gr/regulated-services/balancing/annual-planning/">https://www.desfa.gr/regulated-services/balancing/annual-planning/</a>  Since the beginning of the operation of the BP, in the annual balancing plan, the TSO makes an estimation on the total balancing gas needed for the next year and on the split of the quantity retrieved from the BP and the balancing services. The tendering procedure invites more than one provider to attend.  <a href="https://www.desfa.gr/announcements/procurement-procedures">https://www.desfa.gr/announcements/procurement-procedures</a>
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	Balancing actions: <ul style="list-style-type: none"> <li>STSPs:  <a href="https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/info1">https://www.desfa.gr/regulated-services/transmission/pliroforisimetaforas-page/info1</a> </li> <li>(VTP) Balancing services:</li> </ul>

<sup>6</sup> The feasibility study held by Henex was completed in the end of 2019. The NRA is expecting the confirmation that Henex will develop the trading platform (Henex was given the right from the Greek Law and after the completion of the feasibility study they must state whether they will exercise their right). Realistically, RAE expects the operation of the trading platform by the end of 2020 or the first quarter of 2021. During 2020, RAE will have to decide on the regulatory framework for the operation of the trading platform (submission of the operation code by Henex, public consultation, redrafting and final approval).



		<a href="https://www.desfa.gr/regulated-services/balancing/costs">https://www.desfa.gr/regulated-services/balancing/costs</a> <ul style="list-style-type: none"> <li>Imbalance charge:  <a href="https://www.desfa.gr/en/regulated-services/balancing/daily-price">https://www.desfa.gr/en/regulated-services/balancing/daily-price</a> </li> </ul>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	The imbalance charge methodology is published in the national network code, according to Article 22 of Code.
<b>Cash-out prices set using TP trades</b>	<b>Partial</b>	The cash-out prices relate to trades on the national BP and, if there is no trade, the cash-out price is related to the price of the Dutch Title Transfer Facility ('TTF') for that day. In GY 18/19, the cash-out price was always based on the balancing platform trades.
<b>Small adjustment to deliver marginal cash-out prices</b>	<b>Large</b>	10%. <a href="https://www.desfa.gr/userfiles/pdflist/DRSA/Network%20Code%20-%204th%20Amendment%20-%20Unofficial%20translation.pdf">https://www.desfa.gr/userfiles/pdflist/DRSA/Network%20Code%20-%204th%20Amendment%20-%20Unofficial%20translation.pdf</a> <a href="https://www.desfa.gr/userfiles/pdflist/DRSA/2018-06-29_%CE%A6%CE%95%CE%9A%20%CE%92(2523).pdf">https://www.desfa.gr/userfiles/pdflist/DRSA/2018-06-29_%CE%A6%CE%95%CE%9A%20%CE%92(2523).pdf</a>
<b>Neutrality fully implemented</b>	<b>Yes</b>	Neutrality rules are defined in Article 56 (Balancing Settlement Account) of the national network code: <a href="https://www.desfa.gr/userfiles/pdflist/DRSA/Network%20Code%20-%204th%20Amendment%20-%20Unofficial%20translation.pdf">https://www.desfa.gr/userfiles/pdflist/DRSA/Network%20Code%20-%204th%20Amendment%20-%20Unofficial%20translation.pdf</a> Net balancing neutrality costs of each month are distributed back to the users proportionately to the total throughput of each user during the month. <a href="https://www.desfa.gr/en/regulated-services/balancing/costs">https://www.desfa.gr/en/regulated-services/balancing/costs</a>
<b>Within-day Obligations</b>	<b>No</b>	-
<b>Application of interim measures</b>	<b>Prolonged</b>	RAE has approved a second interim measures report for the extension of the operation of the BP maximum for a year after the operation of the trading platform or for five years (whatever comes first). Imbalance charges derived from the BP or the TTF (fallback option). The operation of a trading platform and the application of related cash-out prices will lead to the removal of interim measures. No updated interim measure report is planned. No tolerances apply since 1 January 2019 and a reduction of the small adjustment was approved by the NRA in June 2018.

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, prolonged</b>	<p>On 18 March 2019, URSO published a decision on prolonging interim measures. Eustream submitted its report to the NRA in September 2018. The Agency received both documents.</p> <p>The TSO applies updated balancing rules according to the Operational Order, chapter 9:  <a href="https://www.eustream.sk/files/docs/eng/Operational_order_190329_EN.pdf">https://www.eustream.sk/files/docs/eng/Operational_order_190329_EN.pdf</a></p>
<b>Trade notification enabled</b>	<b>Yes</b>	
<b>Trade notifications processed within x mins</b>	<b>120</b>	
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Partial</b>	<p>Only old legacy contracts present renomination restrictions and they need to always be balanced. In GY 18/19, this accounted for 73% at Velke Kapusany (entry), 50% at Lanzhot (exit), and 81% at Baumgarten (exit).</p> <p>The TSO may change the nominations in case of threats to the transmission system (Operational Order, chapter 9.4).</p>
<b>Info requirements - system status</b>	<b>Yes</b>	<p>Eustream publishes the projection for the end-of-day aggregated system imbalance. The data is updated hourly:  <a href="https://tis.eustream.sk/TisWeb/#/?nav=bal.sysimb">https://tis.eustream.sk/TisWeb/#/?nav=bal.sysimb</a></p> <p>The linepack forecast is not published.</p>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	<p>The TSO performs balancing actions in case the total system imbalance surpasses +/- 2,000 MWh. The objective is to bring the system back to a close-to-zero imbalance:  <a href="https://tis.eustream.sk/TisWeb/#/?nav=bal.ba">https://tis.eustream.sk/TisWeb/#/?nav=bal.ba</a></p> <p>Eustream sends information about planned balancing actions to users registered on the BP (twenty-five network users registered as of September 2019) via email.</p> <p>Eustream conducted four actions on the BP, out of which three were not successful; balancing services were used in this case:  <a href="https://tis.eustream.sk/TisWeb/#/?nav=bal.bp.bba">https://tis.eustream.sk/TisWeb/#/?nav=bal.bp.bba</a> (choose "all")</p> <p>Eustream also discloses other information under the regulation here:  <a href="http://www.eustream.sk/en_transmission-system/en_other-information/en_3122014-requirements">http://www.eustream.sk/en_transmission-system/en_other-information/en_3122014-requirements</a></p>
<b>Info requirements - network user portfolio</b>	<b>Partial</b>	<p>All flows on the transmission network are intraday metered, with hourly updates. All points in the transmission network, except one with insignificant flow, are subject to operational balancing agreements whereby nominations equal allocations. Therefore, no information model and forecasting party was identified. The TSO provides the information on confirmed quantity, according to Article 34(1) of the Code.</p>

		The distribution network is not part of the transmission system balancing system. This is strictly speaking not in compliance with the Code, but it excludes a sensible amount of gas from TSOs and network users' possible trading activity.
<b>Trading Platform available and used by the TSO</b>	<b>No</b>	Slovakia has a balancing platform, but no trading platform.
<b>STSPs defined and available on Trading Platform</b>	<b>No</b>	Title products are offered on the BP. All auctions conducted were for DA title products.
<b>TSO uses Trading Platform as first gas source</b>	<b>No</b>	There is no TP. The balancing services are the first TSO's source, in practice. If the BP has enough liquidity for title products, it is used as the first source.
<b>TSO uses title product as primary tool</b>	<b>No</b>	On paper, title DA products are first in the merit order. However, due to the lack of liquidity, they are not. In practice, the TSO uses balancing services (based on procurement tender) and residually relies on the neighbouring Austrian market CEGH (this has never occurred in GY 18/19).
<b>TSO uses Balancing Platform</b>	<b>Yes</b>	The Slovak TSO concluded a single trade of DA title product in GY 18/19.
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>Slovakia foresees the possibility for the TSO to use balancing services when STSPs are not likely to sufficiently address the needs of the market or network.</p> <p>The TSO used balancing services three times in GY 18/19. It procured nearly 80% of balancing gas needed via this contract, and the remaining 20% via STSPs traded on the BP. The variable costs of the procured gas through balancing services are rather low, thanks to the low average price and the small volume procured; yet the fixed cost amount to 2.3 mIn EUR in GY 18/19.</p> <p><a href="http://www.eustream.sk/en_transmission-system/en_other-information/en_3122014-requirements">http://www.eustream.sk/en_transmission-system/en_other-information/en_3122014-requirements</a></p>
<b>TSO transparency about balancing action costs</b>	<b>Partial</b>	<p>Eustream discloses information for the running month: <a href="http://www.eustream.sk/files/docs/eng/Neutrality_account.pdf">http://www.eustream.sk/files/docs/eng/Neutrality_account.pdf</a></p> <p>And from the auction history: <a href="https://tis.eustream.sk/TisWeb/#!/?nav=bal.bp.bba">https://tis.eustream.sk/TisWeb/#!/?nav=bal.bp.bba</a></p> <p>Eustream also publishes yearly information on the following address: <a href="http://www.eustream.sk/en_transmission-system/en_other-information/en_3122014-requirements">http://www.eustream.sk/en_transmission-system/en_other-information/en_3122014-requirements</a></p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	<p>Network users' daily imbalance quantities are reduced to zero each day, on payment of the interim imbalance charge: <a href="https://www.eustream.sk/files/docs/eng/price_decision_2017.pdf">https://www.eustream.sk/files/docs/eng/price_decision_2017.pdf</a></p>
<b>Cash-out prices set using TP trades</b>	<b>No</b>	Prices are based on the BP trades, or, in their absence, on the Austrian market CEGH. The methodology for the calculation of the price applied to determine the interim imbalance charge can be found in the Price Decision, paragraph 4.2:

		<a href="https://www.eustream.sk/files/docs/eng/price_decision_2017.pdf">https://www.eustream.sk/files/docs/eng/price_decision_2017.pdf</a> The negative daily imbalance charge is the highest between: <ul style="list-style-type: none"> <li>(i) The highest purchase price of gas purchases made on a BP for the relevant gas day; the purchase price is the weighted average of prices achieved in one auction made on the BP;</li> <li>(ii) Index (CEGHIX + 0.5) * (1 + small adjustment expressed in %).</li> </ul> The positive daily imbalance charge is the lowest between: <ul style="list-style-type: none"> <li>(i) The lowest sale price of gas sales made on a BP for the relevant gas day;</li> <li>(ii) Index (CEGHIX + 0.5) * (1 - small adjustment expressed in %).</li> </ul>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Moderate</b>	The small adjustment has been decreased from 10% to the current level of 7% as of 14 December 2016.
<b>Neutrality fully implemented</b>	<b>Yes</b>	The general principles of the methodology are available at: <a href="https://www.eustream.sk/files/docs/eng/price_decision_2017.pdf">https://www.eustream.sk/files/docs/eng/price_decision_2017.pdf</a> (see chapter 4)
<b>Within-day Obligations</b>	<b>No</b>	
<b>Application of interim measures</b>	<b>Prolonged</b>	<p>Yes, through Decision No. 0001/2019/P-EU; the Agency has been informed:  <a href="http://www.urso.gov.sk:8088/CISRES/Agenda.nsf/0/E7851E77B0677A97C12583BE00307611/\$FILE/0001_2019_P-EU.pdf">http://www.urso.gov.sk:8088/CISRES/Agenda.nsf/0/E7851E77B0677A97C12583BE00307611/\$FILE/0001_2019_P-EU.pdf</a></p> <p>Last approved annual update to report on interim measures (2018):  <a href="http://www.urso.gov.sk:8088/CISRES/Agenda.nsf/0/E7851E77B0677A97C12583BE00307611/\$FILE/Aktualizovan%C3%A11%20spr%C3%A1va%20o%20uplatnen%C3%AD%20predbe%C5%BEn%C3%BDch%20opatren%C3%AD.pdf">http://www.urso.gov.sk:8088/CISRES/Agenda.nsf/0/E7851E77B0677A97C12583BE00307611/\$FILE/Aktualizovan%C3%A11%20spr%C3%A1va%20o%20uplatnen%C3%AD%20predbe%C5%BEn%C3%BDch%20opatren%C3%AD.pdf</a></p> <p>The target initially set for 2019 was not accomplished: Eustream plans to operate the BP and to keep the interim imbalance charge until April 2024.</p> <p>Eustream continues to discuss with energy exchange service providers, which may start and operate a trading platform in Slovakia. The main target of these discussions is to abolish the interim measures by 2024.</p> <p>Eustream will, by 1 October of every year, submit an evaluation report on the Code's implementation status. Eustream will present the results of monitoring the effectiveness of the interim measures, evaluate the degree of liquidity of the market, and propose necessary measures.</p>

## D. Balancing zones that kept other interim measures

### BG - Bulgaria

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, prolonged</b>	The NRA approved new rules, which are in force as of 19 July 2019, on balancing, trading, methodology on interim imbalance charge and neutrality. The new rules shall enable the implementation of a trading platform: <a href="https://bulgartransgaz.bg/en/pages/balansirane-143.html">https://bulgartransgaz.bg/en/pages/balansirane-143.html</a>
<b>Trade notification enabled</b>	<b>Yes</b>	The Commercial Dispatching Platform ('CDP'), which takes up the functions of a Virtual Trading Point ('VTP'), is operational as of 1 January 2017: network users and traders have access to the CDP with individual credentials, where they can submit their nominations, trade notifications, and receive imbalance status every hour, as well as daily and monthly reports.  As of 1 October 2017, trade notifications are being submitted directly to the CDP.  As of 1 January 2020, trade notifications are being submitted via the trading platform.
<b>Trade notifications processed within x mins</b>	<b>120</b>	
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	Full renomination cycle enabled in 2017, not only at the IPs, but at all domestic points.
<b>Info requirements - system status</b>	<b>Yes</b>	Actual linepack and forecast of the linepack at the end of the gas day is available on the website and being updated every hour: <a href="https://bulgartransgaz.bg/bg/pages/linepack-144.html">https://bulgartransgaz.bg/bg/pages/linepack-144.html</a>
<b>Info requirements - TSO balancing actions</b>	<b>Partial</b>	Partial information about balancing actions is available, with monthly breakdown, as of 1 October 2017: <a href="https://bulgartransgaz.bg/en/pages/balansirane-143.html">https://bulgartransgaz.bg/en/pages/balansirane-143.html</a> (hyperlink: balancing actions of the TSO and trades at VTP)
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	Variant 1 option has been selected. Information on DM and NDM offtakes is apportioned and is provided individually at the CDP.  The legislation foresees the access to such data as of 1 May 2017. Based on the information from the NRA, the model is available.
<b>Trading platform available and used by TSO</b>	<b>Envisaged</b>	The platform is available as of 2 January 2020. The NRA reports that the TSO shall become a member of the platform after short internal procedure: <a href="http://balkangashub.bg/en">http://balkangashub.bg/en</a>

<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	Users can trade DA and WD products.
<b>TSO uses Trading Platform as first gas source</b>	<b>Envisaged</b>	The NRA reports that the TSO shall become a member of the platform after a short internal procedure.
<b>TSO uses title product as primary tool</b>	<b>No</b>	<p>The TSO still relies on gas procured through balancing services and stored in its own storage and linepack.</p> <p>In GY 18/19, the TSO relied exclusively on balancing services to balance the network on 30 days, for an amount of 74,480 MWh, at the total cost of BNG 3,230,049 (EUR 1,651,498).</p> <p>The new national balancing rules require the usage of title products as the primary tool. As soon as the TSO becomes a member of the platform, it shall use title products.</p>
<b>TSO uses Balancing Platform</b>	<b>No</b>	<p>A BP was never envisaged under the Bulgarian interim measures.</p> <p>The plan was to use the VTP, potentially improved with a bulletin board, and then migrate to a trading platform.</p>
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>The TSO uses alternatives to a BP: the current system relies on balancing service contracts.</p> <p>EWRC indicates that balancing services could be gradually reduced once the trading platform is operational.</p>
<b>TSO transparency about balancing action costs</b>	<b>Partial</b>	<p>Information about balancing actions and costs is available as of 1 October 2017:</p> <p><a href="https://bulgartransgaz.bg/en/pages/balansirane-143.html">https://bulgartransgaz.bg/en/pages/balansirane-143.html</a></p>
<b>Full daily cash out implemented</b>	<b>Yes</b>	
<b>Cash out prices set using TP trades</b>	<b>Envisaged</b>	The new methodology for the calculation of imbalance and neutrality charges provides for cash out prices set using TP trades. The imbalance charges will be based on the TP trades when the criteria set out in the methodology is fulfilled, namely at least three trades and traded quantities not less than 3,000 MWh for a relevant gas day (to avoid price manipulations).
<b>Small adjustment to deliver marginal cash out price</b>	<b>Moderate</b>	8% as of 1 October 2018, decreased from 10%.
<b>Neutrality fully implemented</b>	<b>Yes</b>	The new methodology for calculation of imbalance and neutrality charges provides for neutrality arrangement in compliance with the Code as of 1 October 2019.
<b>Within Day Obligations</b>	<b>No</b>	The WDOs were not implemented nor used by the time being.
<b>Interim measures agreed by NRA</b>	<b>Prolonged</b>	The tolerances have ended with the new balancing rules entering into force.

		<p>The trading platform has started in January 2020, as a consequence:</p> <ul style="list-style-type: none"> <li>• The alternative to a BP (gas procured through balancing services and stored in TSO's own storage, linepack);</li> <li>• The interim imbalance price shall be ended with a two-month transitory period after the trading platform is considered as fully functional.</li> </ul>
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Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Interim, prolonged</b>	The TSOs consulted on a draft interim measures report in November 2018. <a href="http://gmo-ni.com/transparency/interim-measures">http://gmo-ni.com/transparency/interim-measures</a>
<b>Trade notification enabled</b>	<b>Yes</b>	The NRA confirmed that trade nominations (in local terminology) are in place, enabling gas transfer between network users.
<b>Trade notifications processed within x mins</b>	<b>30</b>	
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	
<b>Info requirements - system status</b>	<b>Partial</b>	Information is available to network users only when logged onto the TSOs' IT System, Delphi.  One value for the end of each gas day is supplied and one forecast: <a href="http://gmo-ni.com/transparency">http://gmo-ni.com/transparency</a>  No hourly updates within the day of projected closing linepack are delivered.
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	Data (volumes and costs) are published for the GY 18/19. <a href="http://gmo-ni.com/assets/documents/Transparency/Balancing-Actions/GY-18-19-Balancing-Actions.pdf">http://gmo-ni.com/assets/documents/Transparency/Balancing-Actions/GY-18-19-Balancing-Actions.pdf</a>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	Northern Ireland uses the base case model of information provision.  NDM information is not addressed in the transmission code, but in the distribution code.  Updates on the exit nominations are offered to users on the gas day D-1 and twice during the gas day D.  The forecasting party was implemented in the autumn of 2017, following an earlier decision by the NRA: <a href="https://www.uregni.gov.uk/publication/forecasting-party-decision-paper">https://www.uregni.gov.uk/publication/forecasting-party-decision-paper</a>  The first NDM Daily Forecast Accuracy Report was published in 2019: <a href="http://gmo-ni.com/assets/documents/Transparency/NDM-Daily-Forecast/NDM-Accuracy-of-Forecasting-Report-Gas-Year-2017-2018.pdf">http://gmo-ni.com/assets/documents/Transparency/NDM-Daily-Forecast/NDM-Accuracy-of-Forecasting-Report-Gas-Year-2017-2018.pdf</a>



<b>Trading Platform available and used by the TSO</b>	<b>No</b>	<p>A balancing point has been established, but there is not enough liquidity for the TSO to procure balancing gas. Northern Ireland is a small market with limited number of market participants and currently no competing source of gas. All gas is imported and market participants have stated they have no interest in trading within Northern Ireland other than title transfers.</p> <p>The TSOs consulted on a trial for a trading platform during 2018, but suppliers indicated they were not interested in purchasing gas at this platform. The TSOs also engaged with the main network users who bring gas into Northern Ireland, but they said they would continue to use the British National Balancing Point ('NBP') to trade and were not interested in a Northern-Irish platform. The TSOs concluded it would not be cost-effective to continue with the trial.</p>
<b>STSPs defined and available on Trading Platform</b>	<b>No</b>	
<b>TSO uses Trading Platform as first gas source</b>	<b>No</b>	
<b>TSO uses title product as primary tool</b>	<b>No</b>	
<b>TSO uses Balancing Platform</b>	<b>No</b>	
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>The TSO balances the network by exclusively relying on balancing services purchased by network users from the market in Great Britain.</p> <p>The contracts are tendered and awarded on a yearly basis to companies registered to trade in Great Britain and ship into Northern Ireland. The price formation is linked to the WD NBP products. For a balancing action buy, the contractor will buy the gas at the NBP and ship it to Northern Ireland, while for a balancing action sell, the contractor will offset against gas coming into Northern Ireland.</p> <p>The NRA shall review, on an annual basis, the necessity of such services.</p>
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>The TSOs annually publish information on the costs, frequency, and quantity of all balancing actions on a daily basis:  <a href="http://gmo-ni.com/transparency/balancing-actions">http://gmo-ni.com/transparency/balancing-actions</a></p>
<b>Full daily cash-out implemented</b>	<b>No</b>	<p>Shippers are cashed out daily, but imbalance tolerances apply, calculated each year for each individual network user (portfolio-based). The tolerance is applied taking account of the expected contribution of four different load categories.</p> <p>A tolerance review took place in 2019 and the further reviews planned for 2020 and 2021 aim at a phased reduction in tolerances.</p>

<b>Cash-out prices set using TP trades</b>	<b>Partial</b>	<p>The TSOs proposed to carry out a trial of a trading platform for Northern Ireland, but there was insufficient interest from suppliers or upstream shippers to proceed.</p> <p>Therefore, the cash-out prices continue to be set using a neutral proxy price defined by the System Average Price in Great Britain.</p> <p>Great Britain is the main source of gas for Northern Ireland network users and TSOs, therefore the cash-out prices maintain a certain link with the relevant market.</p> <p>The process is described in the national Transmission Network Code, from page 106 onwards:  <a href="http://gmo-ni.com/assets/documents/NI-Network-Gas-Transmission-Code-Version-1.5-30th-April-2019.pdf">http://gmo-ni.com/assets/documents/NI-Network-Gas-Transmission-Code-Version-1.5-30th-April-2019.pdf</a></p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Large</b>	<p>Shortfalls beyond the tolerance are charged at 150% of the GB SAP, whereas over deliveries are paid at 70% of GB SAP. This is outlined in section 8.3 of the NI Gas Transmission Code:  <a href="http://gmo-ni.com/network-gas-transmission-code">http://gmo-ni.com/network-gas-transmission-code</a></p>
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>Monthly financial neutrality invoicing occurs:  <a href="http://gmo-ni.com/network-gas-transmission-code">http://gmo-ni.com/network-gas-transmission-code</a>          (Section 9.7 of the NI Gas Transmission Code)</p>
<b>Within-day Obligations</b>	<b>None</b>	
<b>Application of interim measures</b>	<b>Prolonged</b>	<p>All IMs have been retained.</p> <p>The TSOs will investigate what would need to change so that the current trading arrangements would comply as a long-term solution of trading in an adjacent balancing zone.</p> <p>The TSOs submitted further draft interim measures reports in early 2019, but the NRA has asked for a clearer plan to move out of interim measures.</p>

## E. Balancing zones that did not terminate transitory measures

### PT - Portugal

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>2016</b>	In theory implemented by 1 October 2016, in practice still incomplete implementation in October 2019.
<b>Trade notification enabled</b>	<b>Yes</b>	Enabled by 1 October 2015. Currently, only bilateral trades are notified, since a trading platform does not exist.
<b>Trade notifications processed within x mins</b>	<b>30 for WD 120 for DA</b>	DA trade notifications are confirmed up to 120 minutes after submission; for WD trade notifications, confirmation is processed up to 30 minutes after submission. The communication process is the same as the one used for nominations and renominations.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	IP renominations are enabled and effective from 1 October 2015. Nomination timelines are followed according to the Code.
<b>Info requirements - system status</b>	<b>Yes</b>	The end-of-day imbalance is provided. Global end-of-day imbalance incurred in gas day D-1 is published, as well as for each day of the month. The monthly excel files with daily data are available for download on: <a href="https://www.ign.ren.pt/web/guest/desequilibrios-diarios">https://www.ign.ren.pt/web/guest/desequilibrios-diarios</a> Additionally, for each network user, its individual end-of-day imbalance is provided in the user's private web area. Monthly excel files with daily data are available for download by each user. The daily end-of-day forecast of imbalance is not available. Linepack end-of-day forecast is provided: <a href="https://www.ign.ren.pt/web/guest/existencias">https://www.ign.ren.pt/web/guest/existencias</a>
<b>Info requirements - TSO balancing actions</b>	<b>Envisaged</b>	Balancing actions via STSPs are not used until MIBGAS trading platform is available to trade STSPs at the Portuguese VTP. Meanwhile, the TSO uses operational gas reserves of the system users and, secondarily, balancing actions for gas delivered at the Portuguese VTP. <ul style="list-style-type: none"> <li>• The operational gas reserves are made available to the TSO by the users (according to a pro-rata share of users' supply portfolio). The TSO does not publish these values<sup>7</sup>;</li> <li>• The balancing actions consist of buying/selling in DA or WD auctions. Operationally, the TSO performs the balancing actions through a platform provided by the electricity derivatives market operator (OMIP):</li> </ul>

<sup>7</sup> For the time being, ERSE has provided data to the Agency bilaterally.

		<p><a href="https://www.ign.ren.pt/web/guest/aco-es-de-compensacao-do-gtg">https://www.ign.ren.pt/web/guest/aco-es-de-compensacao-do-gtg</a></p> <p>The use by the TSO of users' gas reserves and the balancing services described are transitory until MIBGAS allows trades in the Portuguese VTP.</p> <p>The future balancing actions framework, consistent with the Code, was approved by Directive n.18/2016: <a href="https://dre.pt/application/conteudo/75603348">https://dre.pt/application/conteudo/75603348</a> (in Portuguese language)</p>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	<p>The 'variant 2' information model applies. The model provides for three IDM updates of individual measured flows (during the gas day at 13:00, 20:00, and 1:00 hours) and for one NDM forecast provided to users on the day before the gas day (until 12:00 hours of gas day D-1). The NRA receives the information on daily data on a monthly basis.</p> <p>Each network user can access its reserved area on the TSO's website to consult and manage individual information such as nominations and renominations' confirmed quantities, demand allocations, NDM forecasts, IDM updates, trading confirmations, etc.: <a href="https://www.ign.ren.pt/">https://www.ign.ren.pt/</a></p>
<b>Trading Platform available and used by the TSO</b>	<b>Envisaged</b>	<p>The MIBGAS platform is already functioning in the Spanish market and there are developments under way to allow trades at the Portuguese VTP. The start of trading in MIBGAS has encountered important delays and the NRA cannot communicate a plausible starting date.</p> <p>Although an implicit capacity allocation mechanism for trading between Spain and Portugal is envisaged and supported by both regulators, recent developments point to a first step of the implementation: the establishment of the Portuguese VTP trading in MIBGAS (without implicit allocation mechanism) which shall facilitate the rules' approval.</p> <p>The MIBGAS' proposal for trading rules in the Portuguese VTP is quite advanced and almost ready for implementation. The public consultation on the trading rules at the Portuguese VTP will be launched soon and the rules shall be approved during the first semester of 2020. Moreover, MIBGAS and the Portuguese TSO have been developing data exchange protocols to allow the trading notifications. The Spanish TSO (Enagas) will later also join the work to implement trading with implicit capacity allocation.</p>
<b>STSPs defined and available on Trading Platform</b>	<b>Envisaged</b>	<p>The use of STSPs for balancing actions by the TSO is defined in national regulation (Article 32 of Regulation nr. 417/2016: <a href="https://dre.pt/application/conteudo/74305702">https://dre.pt/application/conteudo/74305702</a>).</p> <p>The merit order is based on title products (WD and DA) and balancing services. However, this is suspended until a trading platform is established for the Portuguese VTP (Diretiva n.º 18/2016: <a href="https://dre.pt/application/conteudo/75603348">https://dre.pt/application/conteudo/75603348</a>).</p> <p>The TSO uses OMIP for buying and selling balancing gas on a weekly basis (balancing actions auctions, as a secondary tool), if needed, along with the gas reserves (primary tool) made available by the users. These measures are transitory.</p> <p>The merit order is described here:</p>

		<a href="https://dre.pt/application/conteudo/75603348">https://dre.pt/application/conteudo/75603348</a> (in Portuguese)
<b>TSO uses Trading Platform as first gas source</b>	<b>No</b>	The use of the MIBGAS trading platform as the first source for gas balancing in Portugal will be assessed once the TP starts its operations in the country.
<b>TSO uses title product as primary tool</b>	<b>No</b>	The balancing rules determine that the TSO uses title products (as primary tool) but these rules are not applicable until a trading platform is in operation. A framework for balancing services is in place, if needed. In practice, in GY 18/19, there were no balancing action and the TSO relied on users' reserve and linepack flexibility.
<b>TSO uses Balancing Platform</b>	<b>No</b>	
<b>TSO transparency about balancing action costs</b>	<b>Envisaged</b>	<p>The TSO must publish annually a detailed report about the costs, frequency, and number of balancing actions taken (Article 33 of the national grid operation code).</p> <p>For the moment, data on every balancing action, including its costs, is being published.</p> <p><a href="http://www.mercado.ren.pt/EN/Gas/MarketInfo/GlobalTechnical/Balancing/Pages/BalancingActions.aspx">http://www.mercado.ren.pt/EN/Gas/MarketInfo/GlobalTechnical/Balancing/Pages/BalancingActions.aspx</a></p> <p>Before resorting to balancing actions, the TSO uses users' reserves and linepack flexibility, for which it pays no explicit cost, therefore no transparency on these is provided.</p>
<b>Full daily cash-out implemented</b>	<b>Partial</b>	<p>There are no imbalance volumes that are cashed-out after the gas day.</p> <p>Imbalances are calculated daily, for each user, using the last forecast made available to the user (depending on consumer segment IDM, DM, NDM). For NDM delivery points, users will pay the interim imbalance charge if imbalances against DA forecasts occur.</p> <p>The end-of-day imbalance clears financially through the daily cash-out price.</p> <p>Yet, for IDM and DM delivery points, users can use a linepack flexibility service, applied pro-rata, available to all shippers without specific cost<sup>8</sup>. Therefore, the full daily cash-out is undermined.</p> <p>The methodology is described in Directive nr. 18/2016 (refer to Procedure nr. 14)</p> <p><a href="https://dre.pt/application/conteudo/75603348">https://dre.pt/application/conteudo/75603348</a> (in Portuguese)</p> <p>In Portugal, the daily cash-out price is equal to the price of the MIBGAS daily products traded on MIBGAS plus the daily transmission tariffs applicable at the interconnection point between Spain and Portugal (VIP Iberico).</p>

<sup>8</sup> As for the linepack service offered to network users, it is defined in Procedure no 5 of (Diretiva n.º 18/2016, link <https://dre.pt/application/conteudo/75603348>). According to that procedure, the NRA (the TSO makes a proposal to the regulator) approves the price of the linepack service annually. This service is not in place now, because gas reserves of the network users are being used for balancing, as a transitory measure. Instead, some linepack flexibility is being offered (free of charge) to the users, pro rata to their yearly gas consumption. The total amount of linepack flexibility offered to users is +/- 15GWh.

<b>Cash-out prices set using TP trades</b>	<b>Envisaged</b>	<p>Presently, daily cash-out prices are set taking the MIBGAS Spanish zone trades as a reference and including the daily transmission tariffs to flow gas between Spain and Portugal. The rule is applied until the implementation of the implicit capacity allocation mechanism.</p> <p>When a reference price exists for Portuguese VTP, the Spanish price will only be used as a backup solution.</p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Moderate</b>	<p>A small adjustment of +/- 2.5% applies:</p> <p><a href="https://dre.pt/application/conteudo/75603348">https://dre.pt/application/conteudo/75603348</a> (in Portuguese)</p>
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>Neutrality charges are determined using a pro-rata mechanism, considering the network user's inputs and off-takes from the transmission network.</p> <p>The neutrality charges/credits are invoiced on a monthly basis along with the transmission charges, but as a different and separate cost item.</p> <p>The neutrality charge data is published by the TSO in the website: <a href="https://www.ign.ren.pt/neutralidade">https://www.ign.ren.pt/neutralidade</a></p> <p>The neutrality charges are not based on forecasted costs and revenues and Article 30(5) is not applicable. Thus, no separate neutrality charges for balancing in respect of NDM offtakes are required:</p> <p><a href="https://dre.pt/application/conteudo/75603348">https://dre.pt/application/conteudo/75603348</a> (in Portuguese language)</p> <p>(National legal reference: Directive n.18/2016, refer to Procedure nr. 15).</p>
<b>Within-day Obligations</b>	<b>None</b>	-

## F. Balancing zones formerly subject to derogation

EE – Estonia

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Formerly derogated</b>	A single Estonian-Latvian entry-exit zone with common balancing rules is in place as of January 2020.
<b>Trade notification enabled</b>	<b>Yes</b>	VTP effectively enables trade notifications.
<b>Trade notifications processed within x mins</b>	<b>30</b>	Maximum 30 minutes for the processing of trade notifications.
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	Renominations are enabled.
<b>Info requirements - system status</b>	<b>Yes</b>	Info available on the website of the balancing system coordinator ('BSC'), which is the Latvian TSO Conexus: <a href="https://capacity.conexus.lv/?id=169&amp;lang=eng">https://capacity.conexus.lv/?id=169&amp;lang=eng</a> The TSO is the forecasting party and the base case information model applies.
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	Currently available here: <a href="https://capacity.conexus.lv/?id=166&amp;lang=eng">https://capacity.conexus.lv/?id=166&amp;lang=eng</a> Quantities of all TSO balancing actions will be published D+1 starting from 2020 on Elering web dashboard too.
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	The NRA reports that the network users are provided with the information about balancing actions, inputs, and off-takes for the gas day and status of the transmission system.
<b>Trading Platform available and used by the TSO</b>	<b>Available and used</b>	The trading platform GET Baltic is available as of January 2020 and will be used by the TSO: <a href="https://www.getbaltic.com/en/">https://www.getbaltic.com/en/</a>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	STSPs (only title WD and DA) are defined and available.
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	Since January 2020, the trading platform is supposed to be the first gas source of balancing actions. Yet, until liquidity is sufficient, the TSO also relies on balancing services.
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	Title products are the preferred option in the merit order list. Until liquidity is sufficient, TSO's balancing needs might be satisfied through balancing services.

<b>TSO uses Balancing Platform</b>	<b>No</b>	No balancing platform will be established.
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>In GY 18/19 balancing services were the main tool used by the TSO (15 GWh, 100% of total TSO's balancing, for a cost of 246,251 EUR).</p> <p>From January 2020, the trading platform is expected to be the first gas source of balancing actions.</p> <p>Balancing services, procured with public procurement also for GY 19/20, will be used only if the trading platform does not meet the necessary requirements for balancing actions.</p>
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>Balancing action costs, frequency, and quantity can be seen at: <a href="https://capacity.conexus.lv/?id=166&amp;lang=eng">https://capacity.conexus.lv/?id=166&amp;lang=eng</a></p> <p>All daily costs of balancing actions will be published.</p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	No tolerances applied, nor will apply.
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	<p>From January 2020, the marginal buy and sell price is calculated based on all day-ahead and within-day trades in title products on the trading platform:</p> <p><a href="https://dashboard.elering.ee/en/gas-balance/prices?start=2020-01-31+22%3A00%3A00&amp;end=2020-02-29+22%3A00%3A00&amp;period=month">https://dashboard.elering.ee/en/gas-balance/prices?start=2020-01-31+22%3A00%3A00&amp;end=2020-02-29+22%3A00%3A00&amp;period=month</a></p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Moderate</b>	From 1 January 2020, it is 5%
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>According to the neutrality charge calculation methodology, all costs and revenues of the balancing actions will be allocated to the neutrality charge and paid by/to the network users.</p> <p><a href="https://elering.ee/en/balance-agreement-0">https://elering.ee/en/balance-agreement-0</a></p>



Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Formerly derogated</b>	<p>The Code has been applicable as of 1 January 2020, thanks to the new national rules:  <a href="https://gasgrid.fi/wp-content/uploads/Rules-for-gas-transmission-1.0-ENG-non-binding-30_07_2019.pdf">https://gasgrid.fi/wp-content/uploads/Rules-for-gas-transmission-1.0-ENG-non-binding-30_07_2019.pdf</a></p> <p>Formally, there are no interim measures planned, yet, a transitory phase is expected before the applicable rules can be fully implemented to allow market-based balancing.</p>
<b>Trade notification enabled</b>	<b>Yes</b>	<p>The VTP effectively enables trade notifications.</p> <p>Balancing responsible shippers and traders, or shippers and traders that are members of the balancing group, shall submit trade notifications to the TSO, which has the responsibility of transferring the gas ownership.</p> <p>The gas exchange's transaction clearer shall be responsible for trade notifications for trades conducted on a gas exchange.</p>
<b>Trade notifications processed within x mins</b>	<b>30</b>	The TSO handles and confirms the trade notifications every 30 minutes, starting from D-1 at 13:00 UTC/12:00 UTC (handbook 4.3.2 (c)).
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	Renominations are enabled.
<b>Info requirements - system status</b>	<b>Envisaged</b>	<p>By the start of the gas day at 5:00 UTC (daylight saving time) or 4:00 UTC (summer time), the TSO with system responsibility shall publish on its portal the green zone of the system for that gas day. The green zone is the zone within which the system's imbalance forecast for the gas day may vary before the TSO carries out balancing actions within the gas day by buying or selling gas on a gas exchange.</p> <p>On the gas day from 5:45 UTC (daylight saving time) or from 4:45 UTC (summer time), the TSO with system responsibility shall publish on its portal the systems forecast imbalance for the gas day and update this forecast every hour until 1:45 UTC (daylight saving time) or until 0:45 UTC (summer time).</p>
<b>Info requirements - TSO balancing actions</b>	<b>Partial</b>	<p>Information regarding balancing is provided on the TSO's portal: <a href="https://gasgridportal.fi/">https://gasgridportal.fi/</a></p> <p>It is only available for the users.</p> <p>See section 9.2 of the national rules:  <a href="https://gasgrid.fi/wp-content/uploads/Rules-for-gas-transmission-1.0-ENG-non-binding-30_07_2019.pdf">https://gasgrid.fi/wp-content/uploads/Rules-for-gas-transmission-1.0-ENG-non-binding-30_07_2019.pdf</a></p>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	Information regarding the network user portfolio is provided by the TSO on the portal: <a href="https://gasgridportal.fi/">https://gasgridportal.fi/</a>

<b>Trading Platform available and used by the TSO</b>	<b>Available</b>	<p>The GET Baltic TP is available. It administrates the electronic trading system for trading spot and forward natural gas products with physical delivery in the market areas located in Lithuania, Latvia, Estonia, and Finland: <a href="https://www.getbaltic.com/en/">https://www.getbaltic.com/en/</a></p> <p>The Finnish TSO has not yet used the trading platform to balance the network.</p>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	<p>DA and WD are traded at the TP.</p> <p><a href="https://www.getbaltic.com/en/trading/products/">https://www.getbaltic.com/en/trading/products/</a></p>
<b>TSO uses Trading Platform as first gas source</b>	<b>Envisaged</b>	<p>According to the new rules, balancing services will be used as a secondary option one the STSPs are liquind enough.</p>
<b>TSO uses title product as primary tool</b>	<b>Envisaged</b>	<p>No locational or temporal actions are foreseen.</p>
<b>TSO uses Balancing Platform</b>	<b>No</b>	<p>There is no BP.</p>
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>According to the confirmed rules by the NRA, the TSO will use balancing services as a last resort.</p> <p>In GY 18/19, the TSO used exclusively balancing services.</p> <p>It is expected that the TSO will be able to decrease the use of balancing service by the end of 2020.</p>
<b>TSO transparency about balancing action costs</b>	<b>Envisaged</b>	<p>Data not yet available.</p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	<p>A balance responsible shipper and trader shall pay the charge or have the right to receive compensation for any daily imbalance quantity of its balance group for each gas day depending on the direction (positive/negative) of the imbalance. The TSO shall calculate the daily imbalance quantity for the gas day for each balance group as follows: daily imbalance quantity = deliveries – offtakes.</p> <p>There are no tolerances nor linepack flexibility service offered to network users.</p> <p>See section 17.4 of the national rules: <a href="https://gasgrid.fi/wp-content/uploads/Rules-for-gas-transmission-1.0-ENG-non-binding-30_07_2019.pdf">https://gasgrid.fi/wp-content/uploads/Rules-for-gas-transmission-1.0-ENG-non-binding-30_07_2019.pdf</a></p>
<b>Cash-out prices set using TP trades</b>	<b>Envisaged</b>	<p>The cash-out price is derived from the weighted average price of intraday products on the gas exchange during the gas day.</p> <p>Price caps and flor still exist for emergency sistuations.</p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Minimal to moderate</b>	<p>0.5% or 3%, depending on the total system imbalance.</p>

<b>Neutrality fully implemented</b>	<b>Envisaged</b>	<p>The NRA monitors the pricing of network operators as a whole in periods of four years.</p> <p>It is not clear how the neutrality is calculated and if it is a separate fee.</p>
<b>Within-day Obligations</b>	<b>None</b>	

Key elements	Coding	Explanation
<b>Implementation date</b>	<b>Formerly derogated</b>	<p>The derogation ended on 3 April 2017.</p> <p>The system worked under a set of rules until 31 December 2019: <a href="https://likumi.lv/ta/en/en/id/290270">https://likumi.lv/ta/en/en/id/290270</a></p> <p>From 1 January 2020, common regulations for the natural gas balancing of transmission system are in place for Latvia and Estonia.</p> <p><a href="https://www.vestnesis.lv/op/2019/220.7">https://www.vestnesis.lv/op/2019/220.7</a></p>
<b>Trade notification enabled</b>	<b>Yes</b>	Standard communication protocol (Edig@s standard) is in use. (Annex 4 of common regulations for the natural gas balancing of transmission system)
<b>Trade notifications processed within x mins</b>	<b>30</b>	<p>As of 1 January 2020 (before: 120 minutes).</p> <p>(Section 6 of common regulations for the natural gas balancing of transmission system)</p>
<b>IP renominations enabled (choice: renomination flexibility at the broader set of points)</b>	<b>Yes</b>	<p>The renomination cycles have been designed and implemented.</p> <p>(Section VII and X of national regulations regarding the use of natural gas transmission system)</p> <p><a href="https://capacity.conexus.lv/uploads/filedir/common_network_rules_ee-lv.pdf">https://capacity.conexus.lv/uploads/filedir/common_network_rules_ee-lv.pdf</a></p>
<b>Info requirements - system status</b>	<b>Yes</b>	<p>Available on the TSO's website from January 2020: all network users' imbalance position, balancing prices balancing action costs: <a href="https://capacity.conexus.lv/?id=169&amp;lang=eng">https://capacity.conexus.lv/?id=169&amp;lang=eng</a></p> <p>Linepack information is not published.</p>
<b>Info requirements - TSO balancing actions</b>	<b>Yes</b>	<p>From January 2020, available on the website of the TSO: <a href="https://capacity.conexus.lv/?id=166&amp;lang=eng">https://capacity.conexus.lv/?id=166&amp;lang=eng</a></p>
<b>Info requirements - network user portfolio</b>	<b>Yes</b>	<p>Any transaction at the VTP or IPs is registered by TSO in the balancing portfolios of the network users.</p> <p>(Section XIV of common regulations for the natural gas balancing of transmission system)</p>
<b>Trading Platform available and used by the TSO</b>	<b>Available and used</b>	<p>The GET Baltic gas exchange is available for the TSO: <a href="https://www.getbaltic.com/en/market-data/trading-data/">https://www.getbaltic.com/en/market-data/trading-data/</a> <a href="https://capacity.conexus.lv/?id=166&amp;lang=eng">https://capacity.conexus.lv/?id=166&amp;lang=eng</a></p> <p>TSO's trade are note separate from other trades therefore it is not possible to distinguish them on the Get Baltic website.</p>
<b>STSPs defined and available on Trading Platform</b>	<b>Yes</b>	<p>Until 31 December 2019 only title products were available.</p> <p>From 1 January 2020, the common rules for the merged Estonian-Latvian balancing zone also provide for locational product to be traded for delivery on a within day or day ahead basis.</p>

		<a href="https://capacity.conexus.lv/?id=137&amp;lang=eng">https://capacity.conexus.lv/?id=137&amp;lang=eng</a> UAB GET Baltic gas exchange: <a href="https://www.getbaltic.com/en/market-data/implicit-capacity-allocation/">https://www.getbaltic.com/en/market-data/implicit-capacity-allocation/</a>
<b>TSO uses Trading Platform as first gas source</b>	<b>Yes</b>	<p>As of 1 January 2020, the TSO is supposed to use the trading platform as a first source.</p> <p>In GY 18/19, the TSO has traded 960 MWh in STSPs, or 54% of total balancing actions.</p>
<b>TSO uses title product as primary tool</b>	<b>Yes</b>	As of 1 January 2020, the title product is the primary tool used.
<b>TSO uses Balancing Platform</b>	<b>No</b>	Until the end of Q1/2019, the TSO used an alternative to a BP by means of balancing services.
<b>TSO makes use of balancing services</b>	<b>Yes</b>	<p>From the opening of the gas market, on 3 April 2017, until 30 October 2018, only balancing services were used by the TSO due to the low liquidity of the short term wholesale gas market.</p> <p>TSO started to use gas exchange more actively in Q3/2018.</p> <p>In GY 18/19, balancing services covered 830 MWh, or 46% of total balancing actions. STSPs covered 960 MWh, or 54% of total balancing actions.</p> <p>Balancing services are still available in GY 19/20, but as a secondary tool.</p> <p>(Section XIV of the common regulations for the natural gas balancing of transmission system)</p>
<b>TSO transparency about balancing action costs</b>	<b>Yes</b>	<p>TSO's balancing action costs, frequency, and quantity can be found at: <a href="https://capacity.conexus.lv/?id=166&amp;lang=eng">https://capacity.conexus.lv/?id=166&amp;lang=eng</a></p> <p>(Section XIV of the common regulations for the natural gas balancing of transmission system)</p> <p>All daily costs of balancing actions will be published.</p>
<b>Full daily cash-out implemented</b>	<b>Yes</b>	<p>Network users are exposed to the full daily imbalances.</p> <p>(Section 8 of common regulations for the natural gas balancing of transmission system)</p>
<b>Cash-out prices set using TP trades</b>	<b>Yes</b>	<p>Cash-out prices during GY 18/19 were determined by taking into account both the performance of the balancing service agreement and the exchange prices.</p> <p>From 1 January 2020, the cash-out prices are set based on STSPs' trade: <a href="https://capacity.conexus.lv/?id=145">https://capacity.conexus.lv/?id=145</a></p> <p>Alternative pricing is still foreseen in case of insufficient market liquidity, according to the national balancing rules.</p> <p>(Article 8.6 of common regulations for the natural gas balancing of transmission system)</p>
<b>Small adjustment to deliver marginal cash-out price</b>	<b>Moderate</b>	<p>From 1 January 2020, it is 5%</p> <p><a href="https://capacity.conexus.lv/?id=227&amp;lang=eng">https://capacity.conexus.lv/?id=227&amp;lang=eng</a></p>

		(Article 8.10 of common regulations for the natural gas balancing of transmission system)
<b>Neutrality fully implemented</b>	<b>Yes</b>	<p>From 1 January 2020 the neutrality charge in line with the Code:  <a href="https://capacity.conexus.lv/?id=237&amp;lang=eng">https://capacity.conexus.lv/?id=237&amp;lang=eng</a></p> <p>(Section 8 of common regulations for the natural gas balancing of transmission system)</p> <p>Before, the neutrality charge was not set separate from transmission tariffs.</p>
<b>Limited Within-day Obligations</b>	<b>None</b>	
<b>Application of interim measures</b>	<b>No</b>	<p>Latvia held a derogation from implementing the Code. Yet, it implemented elements of the Code, also resorting to interim measures (alternative to a balancing platform, interim balancing charge, and tolerance of 5% until the end of 2018, then decreased to 3%). All interim measures were terminated by Q1/2019.</p>