

COMMENTS OF USER 1

1. Comments to the definitions given in GLOSSARY on the terms:

IP: International Connection Point

Comment: Se propone utilizar la definición incluida en la “Guidance for Interconnection Agreements” elaborado por ENTSO-G: “shall mean the connection between the TSO 1 System and the gas transportation system of TSO 2. The measuring and/or determination of the quantities for this IP shall be carried out at the Border Metering Station.

The IP’s definition would be:

The connection between the TSO 1 System and the gas transportation system of TSO 2. The measuring and/or determination of the quantities for this IP shall be carried out at the Border Metering Station.

The comment has been accepted

Network User:

Comment: No estamos de acuerdo en que se incluyan los clientes potenciales en la definición de Network User, por lo que proponemos que se suprima de la definición o que se defina tal y como se indica en la “Guidance for Interconnection Agreements” elaborado por ENTSO-G: “shall mean a Network User of TSO 2 and/or Network User of TSO 1.”

The Network User’s definition would be:

Means a customer of a transmission system operator, and transmission system operators themselves in so far as it is necessary for them to carry out their functions in relation to transmission.

The comment has been accepted

Nomination:

Comentario: Se propone el siguiente redactado para la definición de nominación, o utilizar la definición de Shipper Nomination incluida en la “Guidance for Interconnection Agreements” elaborado por ENTSO-G: “The nomination or renomination as described in the EASEE-gas CBP 2003-002-03 Matching and Nomination”

The Nomination’s definition would be:

*Means **the amount informed** by the network user to the transmission system operator of the flow that the network user wishes to inject into or withdraw from the system.*

The comment has been accepted

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Processed Quantity or Processed Quantities:

Comment: Se propone modificar el redactado de la definición de Processed quantity para que tenga en cuenta las nominaciones que puedan hacer los TSOs.

The Processed Quantity or Processed Quantities's definition would be:

*Means the quantity of gas determined by the initiating TSO and by the matching TSO, which takes into account the Shippers' **and TSOs'** nominations or re-nominations and contractual provisions as defined under the relevant transport contract and which is used as the basis for the matching process.*

The comment has been accepted

Shipper code:

Comment: Se propone modificar la definición utilizando de modelo la definición de "Network User code pair" incluida en la "Guidance for Interconnection Agreements" elaborado por ENTSO-G: "shall mean a unique pair, of alphanumeric Network User codes to identify the Counterparty Relationship at both sides of the IP"

The Shipper's code definition would be:

*Code used to identify Shippers. **A unique alphanumeric Network User code to identify the Shipper at both sides of the IP.***

The comment has been accepted

2. Comments in COMMON REFERENTIAL in relation to:

Comments:

- 1. En la propuesta que se hizo del Protocolo de Detalle PD-23 "Parámetros de la red de transporte que determinan el uso de productos locales o servicios de balance", se indicaba que en caso de Conexiones Internacionales, sólo se podrán solicitar productos locales si está contemplado en el Interconnection Agreement de la Conexión Internacional: "En el caso de las conexiones internacionales, el GTS solicitará oferta de un producto local siempre y cuando esta posibilidad esté contemplada en el Acuerdo de Interconexión establecido con el operador adyacente correspondiente". Consideramos que debe incluirse en el Interconnection Agreement la posibilidad del uso de productos locales, ya que pueden ayudar a solucionar posibles congestiones.*
- 2. Adicionalmente, faltarían por incluir algunos aspectos que se establecen en el Artículo 7 del Network Code de Interoperabilidad "Principios de medición de la cantidad y la calidad del gas" tales como: quién es el responsable de la instalación y operación y mantenimiento del equipo de medida. Asimismo, la propuesta de Interconnection Agreement no dice nada sobre los principios de medición que se acuerdan entre los TSOs ni sobre qué sucede si los TSOs no cumplen con las obligaciones en la estación de medida.*

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About the first comment, such point is not fully developed in the National Regulation, it might be included in the following reviews of the Interconnection Agreement. **The comment has been considered for a later stage.**

About comment 2, the aspects referred to are included in the Measurement Protocol. **The content of this protocol is not included among those in the Article 3 of the Interoperability Regulation about which a public consultation is to be made.**

3. Comments in EXCEPTIONAL EVENT SITUATION.

Comment: En la “Guidance for Interconnection Agreements” elaborado por ENTSO-G, se incluyen algunas situaciones que no están en la propuesta de Interconnection Agreement, tales como los casos de emergencia por defecto y por exceso de gas, por lo que se propone añadirlos.

These situations are:

In case of a Gas Shortage Emergency, TSOs shall cooperate in order to minimize any constraints (planned/unplanned maintenance works) and to ensure the highest reliability of the respective systems.

TSO who has a Gas Excess Event shall inform the other TSO about the daily quantities available and the adjusted quantities of each of their involved Network Users making their best effort to send the communication as soon as possible and before the expected event will occur. Also, the same TSO shall inform their Network Users and request them to inform their related parties upstream and downstream as soon as possible.

The comments have been accepted.