

## COMMENTS

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**

**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.*

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.**



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4. Comments on the definitions given in the GLOSSARY about:

**Gas Day y Gas Week:**

*Comment: The changes are proposed to provide the document with the highest accuracy.*

Gas Day and Gas Week's definitions would be:

**Gas Day:**

*Means the period from 5:00 **am** to 5:00 **am** UTC the following day for winter time and from 4:00 **am** to 4:00 **am** UTC the following day when daylight saving is applied. That is, the Gas Day is the period from 6:00 **am** to 6:00 **am** according to the Spanish and CET time.*

**Gas Week:**

*Means the period from 6:00 **am** on Saturday of the present Week to 6:00 **am** on Saturday of the next Week according to the Spanish and CET time.*

**The comments have been accepted**

**Off-spec gas:**

*Comment: In the section "Glossary", "off-spec gas" is defined as: "Shall mean Gas that does not meet the specifications at the Interconnection Point." We think it is necessary to clarify to which specifications the definition refers, by detailing them or by citing where these specifications are established. This clarification is necessary to perfectly understand the definition.*

Reference conditions are included in the Measurement protocol which is not for public consultation

The following definition of Off-Spec gas is proposed as follows:

**Off-spec gas:**

*Shall mean Gas that does not meet the specifications at the Interconnection Point. (\*)*

*(\*)The above mentioned specifications are gathered in the regulation of every country.*

**The comment has been accepted**

**IP: International Connection Point**

*Comment: It is proposed to include the definition of "Interconnection Point" in the "Glossary" because it is named throughout the document but it is not included.*

**The comment has been accepted**

## 5. Comments in ALLOCATION

*Comment: As the comment 1, it is proposed to detail if the time considered is am or pm to provide the document with the highest accuracy.*

The proposed wording would be:

*(...)TIGF will send simultaneously to ENAGAS GTS and ENAGAS TR the following information before 10:00 **am** of Gas Day D+1(...)*

*(...)In case no measure was received once reached 10:00 **am** deadline, ENAGAS GTS will use its best estimation.” (...)*

**The comments have been accepted**

## 6. Comments in EXCEPTIONAL EVENT SITUATION.

*Comment: An exceptional event may create imbalances for a shipper on the one or the other side of the border.  
If back-up procedures are available, they should be communicated to shippers.  
We particularly think of a failure of IT systems where on of the TSOs cannot process shippers' nominations.*

*The points at which the users would be informed would be:*

*(...) As well as inform, as soon as possible, their Shippers about:*

- 1) The possible impact on their Confirmed Quantities at VIP.PIRINEOS*
  - 2) The back-up procedure, if any, put in place to provide the transmission service***
  - 3) The impact on their Imbalance penalties***
  - 4) Expected and actual end of the exceptional event.*
- (...)”*

Related to the point 2 and according to the Interoperability Code:

*“The transmission system operator affected by an exceptional event shall be required, as a minimum, to inform its network users with respect to point (b) and (c) of this paragraph if there is a potential impact on their confirmed quantities and the adjacent transmission system operator(s) with respect to point (a) and (c) of this paragraph of the occurrence of such exceptional event and to provide all necessary information about:*

- (a) the possible impact on the quantities and quality of gas that can be transported through the interconnection point;*
- (b) the possible impact on the confirmed quantities for network users active at the concerned interconnection point(s);*
- (c) the expected and actual end of the exceptional event”.*



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Thus, the EXCEPTIONAL EVENT SITUATION point meets the information obligations to the users.

Likewise, the backup procedure included in the 10<sup>th</sup> Point of this Interconnection Agreement establishes the e-mail as the back-up for the exchange of information in the event of a disruption of the communication system between ENAGAS GTS and TIGF.

The communication systems between the network users and TSO's have a High Level Service Agreement (Platinum Category) which guarantees an availability of the services of 99%.

Referring to the point 3, users cannot be informed about the imbalance penalties impact because it is not possible to know the imbalance quantity and the price at the end of the gas day. However, it is only known a reduction at the point where which such reduction is applied, such information is communicated.

7. The Comments are of general nature:

- *(..) we understand that the interconnection agreement must be public since the operation of the interconnection points may affect third parties, particularly adjacent transmissions system operators (..)*
- *(..) we think that the technical capacity information of each interconnection point of the VIP should be published in a daily basis, to fulfil the philosophy of the regulation (..)*

The technical capacity is published on the website of Enagas.

- *(...) We believe that the “Rules for flow control” reflect an important aspect that should be submitted to public consultation and on which transparent information should be provided (...)*

The article 4 says: “Before concluding or amending an interconnection agreement which contains the rules referred to in Article 3(c), (d) and (e),

- (c) matching process rules
- (d) allocation gas quantities rules
- (e) communication procedures in case of exceptional events

transmission system operators shall invite network users to comment on the proposed text of those rules at least two months before the agreement is concluded or amended”.

Rules for low control are not included in this point.

- *(..)To define these limits and flexibilities, it should be taken into account that the flow modulation capacity in the interconnection points is larger than in the regasification terminals. The regasification terminals are designed to work in specific rates of production, thus they need more flexibility than the interconnections that could have differences much lower between nominations and physical flows (..)*

The purpose of this Interconnection Agreement is VIP Pirineos and not regasification terminals.

The reached Agreement between TIGF and ENAGAS satisfies all the points of the Network Code on Interoperability 2015/703, reinforcing transparency as well as the cooperation and complying with the target obligations of this Regulation. One of these points (article 4) is the invitation network users to comment on the proposed text of rules referred to in the article 3(c), (d) and (e):

- (c) rules for the matching process
- (d) rules for the allocation of gas quantities
- (e) communication procedures in case of exceptional events

The TSO’s have considered the network users’ comments when preparing this Interconnection Agreement so that the grade of transparency is indicated in this Regulation.