

Booking Platform decision for the German-Polish Interconnection points Public workshop

19th June 2018 from 09:00 to 15:00 CET

ACER, Trg Republike 3, 1000 Ljubljana, Slovenia

Minutes

1. Opening and Introduction [The Agency presented slides]

The Agency explained that it will use the responses from the stakeholder consultation to get a general idea of what the market participants think is important with respect to the choice of a booking platform.

2. Legal requirements

2.1 Presentation by the Agency on legal requirements [The Agency presented slides]

The Agency has identified three different sets of criteria that could be used to assess the booking platforms.

1. EU legal requirements, which will be “pass or fail” criteria.
2. National requirements, which will be “pass or fail” criteria
3. Other criteria related to user friendliness, IT, IT-security etc., which will be scored.

The Agency asked the participants if there are any criteria missing from list of EU requirements. There were no comments from the participants.

2.2 Presentation by NRAs with details on the national provisions [BNetzA and URE presented slides]

Discussion on national provisions:

A participant mentioned that the national Transmission Network Code that URE referred to on the Edig@s and AS4 protocol addresses TSOs and network users, not booking platforms.

In response to URE’s statement, that the German national provisions seem to address the TSOs, not the booking platforms (‘BP’), the German TSOs pointed out that they have to fulfil the requirements through the BP. For example, the capacity upgrade service can only be done on the platform used by the TSO. BNetzA pointed out that according to NC CAM the booking platform should act on behalf of the TSOs.

3. Criteria in consultation document

3.1 Presentation by the Agency on other criteria [The Agency presented slides]

The Agency presented the criteria included in the consultation documents. Most of the criteria come from the Baringa study. Baringa has already evaluated the booking platforms in 2015. Things might have changed since, so the Agency would like to check if the evaluation needs to

be updated. The Agency would also like to see what the stakeholders think are important criteria for the evaluation of a booking platform.

3.2 GSA [GSA presented slides]

Discussion on GSAs presentation:

The Agency asked GSA to clarify what they mean by the statement '*based on synergy, additional costs do not need to be paid*'. The Agency pointed out that these questions do not have to be answered now: commercially sensitive information should not be shared in the meeting.

A participant asked about the separation of GSA and GAZ-SYSTEM (staff, IT systems). GSA stated that the business development is shared between the two, but internal resources are split and divided.

A participant mentioned that there may be a difference between ISO certificates for companies and ISO certificates for the services/IT measurements they are using. GSA pointed out that the ISO certificates are checked every year – they have to be renewed.

A participant asked who within GAZ-SYSTEM decides on the platform development. GSA explained that a part of the GSA budget is reserved for development, if the desired development is covered within that, a decision can be made faster. If it requires an excessive amount of money, it might be an internal decision within the company. The decision is up to the person managing that business area. Unforeseen and high costs might be decided higher in the organisation (management board).

A participant asked about the legal structure of GSA. GSA clarified that the booking platform GSA is a trademark and intellectual property developed by GAS-SYSTEM.

3.3 PRISMA [PRISMA presented slides]

Discussion on PRISMAs presentation:

A discussion took place on the implementation process. PRISMA explained that the implementation time depends on the complexity of the solution. Developing the prototype is not hard and usually takes up to 4 weeks. This excludes the decision making process. It is not necessary to have PRISMA shareholder meeting decisions (based on ENTSOG voting rights) for every new development. For example, the senior advisory group can also make decisions on small projects. A specific requirement from a TSO, that does not affect another party, does not need a decision from the advisory group etc. In the service contracts, it is stated that PRISMA will develop the national requirements if those do not affect the overall usage of the platform. The requesting party pays the costs.

On the PRISMA platform the AS2 protocol is currently available, AS4 could be developed upon request. Edig@s is only in place for REMIT reporting but can be extended to TSOs & shippers on request. However, further implementation of Edig@as would take some time. A participant asked how long it would take to implement AS4. PRISMA responded that AS4 would be simple to implement, it depends on the party but a few weeks at the most.

A participant asked how the cost allocation works. PRISMA explained that if one TSO has a request, PRISMA contacts the other TSOs to see if they want to be included to split the costs. Otherwise the requester pays (the operational cost is agreed upfront). Another participant asked what happens if one TSO requests something, pays, and then another TSO wants the same thing. PRISMA explained that if another TSO joins in later they would also share the costs (until these are depreciated).

A participant asked what the workload is like for a TSO being involved in a work group. A German TSOs explained that a TSO does not have to attend or be involved if they do not want to. There are usually meetings every 4 weeks, the workload is not that heavy, TSOs do not have to be physically present at meetings. PRISMA prepares the meetings and sends out agendas.

A participant asked if there are any costs for additional services. PRISMA answered yes, they charge for additional services (membership and additional fees).

3.4 RBP [RBP presented slides]

Discussion on RBPs presentation:

A participant asked what the implementation process for new requirements is like. RBP explained that they first analyse each request on a case-to-case basis. The membership fee covers general development of the platform. If one TSO has a good idea, RBP will implement it for everyone if the budget allows. For major issues, where the whole function needs to be developed from scratch, it is up to the individual TSO to finance it. It is the head of the development department who makes these major decisions (with some financial limits on his freedom to make decisions) and there is usually no need for further approval.

A participant asked about how the IT structure is separated from the TSO. RBP answered that the operational directorate, which is clearly separated from the TSO, handles operations. RBP's interface is not the same as the TSO's, it is functioning on its own. There is a real-time backup of IT security and external companies identify the users. If a daily auction cannot start on time, it does not mean that it is cancelled. When the platform is online again, the process continues. A participant asked how RBP dedicates costs. RBP explained that they have special contracts with their IT providers to track the costs, there are certain people working only with RBP.

4. Questions from market participants

The Polish association of gas shippers proposed three criteria: current and *future* costs of the platform, cost for back-end systems, and security of information and cybersecurity. The cost for back-end systems will 'even out' as on each side of the border shippers may need to adjust.

5. Next steps [The Agency presented slides]

A participant asked the Agency to clarify what is meant by '*bare statements and unsubstantiated claims will be regarded as insufficient*'. The Agency explained that the booking platforms would need to include proof that they meet the requirements, such as a full Baringa score on a criteria, or ISO certifications. A participant suggested looking at the terms of reference used in the case of the Austrian/Hungarian booking platform tender.

The Agency explained that only the 'other criteria' (non-legal criteria) will be scored. A participant remarked that the price is used to evaluate the offers, but price is also captured in the other criteria. Another participant remarked that not all items are that easy to score, for example, multi-currency should be a yes or a no criteria.

A participant asked about the implementation period. The Agency replied that at first glance, three months seems reasonable. The participants discussed what could be considered a reasonable implementation time. The German TSOs commented that 2-3 months is not realistic. RBP thought it is reasonable based on their experience with the Austrian TSO.

The Agency asked which measures NRAs have to enforce timely implementation. BNetzA explained that they use penalties to enforce implementation by the TSOs. URE did not have a concrete idea for enforcement.

A participant mentioned that the timing is very tight and asked for an extension to submit an offer, e.g. 6 September. The Agency replied that 6 September is too late, but will consider reviewing the timelines. The Agency added that the draft offer letter should give a clear idea on the terms of reference and allow the preparation of the offers.

A participant asked if the weighing of the criteria will be made transparent in the request for offers. The Agency answered that on the one hand, it values transparency, but it is also important to avoid gaming. In the final decision, this will be made transparent (commercially sensitive data will be kept confidential).

A participant asked if platforms would offer implicit auctions in the future. The Agency replied that this is beyond the scope of the decision.

A participant asked if the offer from the booking platform has to cover all legal requirements or only the EU requirements. The Agency clarified that the offer needs to cover all legal requirements (EU and national). If a national requirement is not yet complied with, this needs to be mentioned in the offer.

A participant asked if the booking platform would have to make an offer per IP. The Agency explained that this will be specified in the letter. Formally, the CAM NC refers to 'per IP', but the Agency may also consider joint offers. Another participant remarked that separate booking platforms on two points establishing a VIP could be problematic.

Further suggestions on questions to booking platforms can be submitted by end of the week in writing.