December 08, 2017 № GE/02-7942

на № _____ от _____

**Agency for the Cooperation
of Energy Regulators
Trg republike 3
1000 Ljubljana, Slovenia
tel. +386 (0) 82053 400**

Dear Sir/Madam,

Having regard to the public consultation on the proposed changes to the electronic formats for transaction data, fundamental data and inside information reporting, open from 5 October 2017 to 8 December 2017 (PC_2017_R_03), Gazprom export LLC has prepared a feedback on proposed changes and additional changes and comments to the electronic formats.

Please find the filled forms for providing respondent's feedback on proposed changes and additional changes and comments attached.

Attachment: on 5 pages.

Yours faithfully,

**Deputy Director General
for Gas Export**

Dmitry Averkin

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.3 concerning new UTI format *

Respondent's view *

It is reasonable to support the proposed amendment.

However, it is necessary to clarify whether the compatibility and interaction with the old UTI format will be provided.

In particular, in case of error detection in reported data and occurrence of retroactive changes the reported data is reloaded with status «Modify» and indication of UTI code.

In case of introduction of the new UTI format technical limitations may arise on the RRM side following the mismatch between allowable characters.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex C- Form for providing additional changes and comments

Data type	Table 2
Impacted field(s)	TRUM Data field No (15) Price or price formula, schema field Price or price formula (formula) TRUM Data field No (25) Fixing index
Description of your change proposal/Other comment	**Allow the use of space character for reporting Data field No (15) Price or price formula, schema field Price or price formula (formula), and Data field No (25) Fixing index.** **Allow the use of special character "," (or ".") for reporting Data field (25) Fixing index**
Motivation for the change	**The proposal is determined by the complexity of price formulas used in long-term gas contracts. The proposed changes will make reporting of price conditions more convenient.**

Annex C- Form for providing additional changes and comments

Data type	Table 2
Impacted field(s)	TRUM Data field No (15) Price or price formula, schema field Price and price formula (formula)
Description of your change proposal/Other comment	Introduce the identifier which allows to divide different price formulas reportable within the Data field No (15) Price or price formula, schema field Price and price formula (formula), for instance by approving the use of character ";" as separator.
Motivation for the change	The proposal is determined by the complexity of price formulas used in long-term gas contracts. The proposed changes will make reporting of price conditions more convenient.

Annex C- Form for providing additional changes and comments

Data type	Table 2
Impacted field(s)	TRUM section "Fixing index details", schema section Details for the index
Description of your change proposal/Other comment	Introduce an additional field, placed within the section "Fixing index details", schema section Details for the index, for separation of data on abbreviation of price quotation in formula and its description. At the current moment all data is reported in Data field No (25) Fixing index.
Motivation for the change	The proposal is determined by the complexity of price formulas used in long-term gas contracts, and by the use of abbreviations in price formulas. The proposed changes will make reporting of price conditions more convenient.

Annex C- Form for providing additional changes and comments

Data type	Table 1 and 2
Impacted field(s)	**TRUM Table 1 section "Transaction details"** **TRUM Table 2 section "Contract details"**
Description of your change proposal/Other comment	**Add new fields to Table 1 section "Transaction details" and Table 2 section "Contract details" for units of measurement of gas quantity for pricing purposes. In addition, introduce an additional possible value among acceptable values - thousand cubic metres.**
Motivation for the change	**The proposal is determined by the complexity of price formulas used in long-term gas contracts, and by the existence of different units of measurement of gas quantity applied to the price of gas and volume of delivery. For instance, the price is set in US dollars per thousand cubic metres, and the volume of delivery is defined in million cubic metres. The current schema does not allow the use of such unit as thousand cubic metres which is intrinsic to price formulas.**