

Consultation

„Common Data Exchange Solutions“ according to Art 23 Interoperability Network Code

1. Legal Basis

By May 21, 2015, the Commission Regulation (EU) 2015/703 of 30 April 2015 establishing a network code on interoperability and data exchange rules regarding natural gas transmission networks – better known as Interoperability Network Code („INT NC“)¹ – entered into force; the provisions apply as of May 1, 2016.

The aim of the INT NC is to reach an appropriate level of harmonization across the various transmission systems in technical, operational and communications matters. Potential barriers to efficient gas trading and gas transport within the European Union shall be avoided and the completion and functioning of the European internal gas market, security of supply, and appropriate and secure access to information shall be guaranteed. Therefore, the INT NC provides, inter alia, rules and procedures for the harmonization of the data exchange between the transmission system operators as well as between the transmission system operators and their communication partners, also named as counterparties (see Whereas Clause 3 and Whereas Clause 8).

By May 1, 2016, transmission system operators and counterparties concerned shall implement and apply one or more of the following types of data exchange according to Art 21 INT NC.

- a.) For the document-based data exchange:
- Protocol: AS4.
 - Data format: Edig@s-XML.
- b.) For the integrated data exchange:
- Protocol: HTTP/S-SOAP.
 - Data format: Edig@s-XML.
- c.) For the interactive data exchange, the protocol shall be HTTP/S.

For all data exchange types as set out in point a.) to c.) the network shall be internet.

All data exchange solutions used for communication purposes shall also meet the security and availability requirements for data exchange systems as disclosed in Art 22 INT NC.

¹ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R0703&from=DE>.

However, according to Art 23 INT NC, those solutions for the data exchange between transmission system operators and counterparties concerned still existing by May 21, 2015, can be continued to be used after consultation with network users and subject to the approval of the national regulatory authority, which is competent for the respective transmission system operator, provided that the existing solutions fulfil the respective security requirements and are in compliance with the requirements of the data exchange according to Art 22 INT NC.

2. Considerations

GAS CONNECT AUSTRIA GmbH will offer the data exchange types as set out in point 1. a.) and c.) to other transmission system operators and counterparties concerned by May 1, 2016. In particular, the latest version of ENTSOG Common Network Operation Tool ("CNOT") according to Art 24 INT NC and as published in the ENTSOG website will be implemented by GAS CONNECT AUSTRIA GmbH. Albeit GAS CONNECT AUSTRIA GmbH intends to file an application for approval with Energie-Control Austria für die Regulierung der Elektrizitäts- und Erdgaswirtschaft („E-Control“) for the timely limited further use of certain existing common data exchange solutions with network users.

For that reason, GAS CONNECT AUSTRIA GmbH hereby consults all counterparties concerned regarding those common data exchange solutions to be considered in its opinion, for which an approval for a timely limited further use shall be applied for with E-Control.

3. Subject of the Consultation

3.1 Scope

The subject of this consultation shall be GAS CONNECT AUSTRIA GmbH's application for approval with E-Control for the further use of the following disclosed and still existing common data exchange solutions regarding transmission networks and therefore at each interconnection point of GAS CONNECT AUSTRIA GmbH for a transitional period until January 31, 2018, at the latest.

- Protocol: AS2.
- Data format: KISS-A.

Explicitly not part of the consultation shall be the following disclosed an already existing common data exchange solution regarding transmission networks and therefore at each interconnection point of GAS CONNECT AUSTRIA GmbH:

- Unencrypted e-mail.

Condition precedent for a potential application for exemption shall be the fulfilment of the respective security requirements by an already existing common data exchange solution, which is not the case with unencrypted e-mail according to Art 22 Abs 1 lit a) INT NC. Consequently, unencrypted e-mail correspondence for the data exchange concerned must not be used in any case by May 1, 2016.

3.2 Transitional Period

GAS CONNECT AUSTRIA GmbH is of the opinion that the existing solutions should continue to be available for a limited period of time that is identical for all market participants and that the solutions to be continued under the exception to be applied for should be the same throughout the whole Market Area East. Therefore, GAS CONNECT AUSTRIA GmbH proposes a transitional period until 31 January 31, 2018, for the continued use of those common data exchange mentioned in point 3.1.) and to be applied for, which

seems to be reasonable with regard to the mandatory necessary IT implementation in the systems of the counterparties concerned.

4. Consultation Period

This consultation is open to all market participants until April 25, 2016 at the latest.

We kindly ask you to send us only one joint consultation response per company in each case by letter or e-mail to the following address:

GAS CONNECT AUSTRIA GmbH
"Consultation Data Formats"
Floridsdorfer Hauptstraße 1
1210 Vienna

E-Mail: Consultation.Art21INTNC@gasconnect.at

Unfortunately, responses, which are not filed in due time – therefore until April 25, 2016 at the latest – cannot be considered.

After expiry of the consultation period the consultation responses received will be published accordingly for transparency reasons. In case a consultation response shall be treated confidential, we kindly ask you to state that expressly.