

Consultation response
to the implementation proposals
for continued use of existing data exchange solutions
put forward by the German gas transmission system operators (TSOs)
in relation to TSO-counterparty communications
under the Network Code on Interoperability and Data Exchange
(NC INT)

<i>Respondent:</i>	Gazprom export LLC
<i>Communications have been established with:</i> <i>(please state relevant TSO)</i>	Gas Connect Austria
<i>Address of respondent:</i>	Ostrovskogo Sq. 2a Litera "A", St.Petersburg, 191023 Russia
<i>Contact for further queries:</i> <i>(please include contact details)</i>	Alexandra Afonina, +7 812 646 14 12
<i>Market role:</i> <i>(please underline as appropriate)</i>	shipper

Questions for the counterparties concerned

1. Do you agree that the consultation document describes all TSO-counterparty communication processes falling within the personal and material scope of application of NC INT (see Table 2 of the consultation document)? If not, what additional communication processes would you consider to fall within the network code's scope? Please also provide the reasons for your view.

N/A

2. Is there any other existing data exchange solution (e.g. encrypted and signed email) you think should continue to be used and included in the application for approval?

We think AS2 protocol should continue to be used and included in the application for approval.

3. The TSOs are under an obligation to offer the required common data exchange solutions (AS4/Edig@s-XML, see Table 2 of the consultation document) from 1 May 2016. Are you in a position to implement the necessary changes on your part by 1 May 2016 so that you will be able to switch to the new solutions on 1 May 2016?

Currently we are not in a position to implement the necessary changes on our side by 1 May 2016.

4. If you do not think that you will be able to implement the common data exchange solutions ultimately required under NC INT (AS4/Edig@s-XML, see Table 2 of the consultation document) by 1 May 2016 (see question 3): In view of the experiences made in connection with past switches the TSOs believe that a period of one and a half years is a reasonable transition period. Do you agree with this view? If not, please state what other transition period you would consider reasonable and give your reasons.

We believe that 3 years is a reasonable transition period to implement the common data exchange solutions ultimately required under NC INT (AS4/Edig@s-XML).

5. Are there any other remarks or aspects you think should be taken into account?

The implementation of the common data exchange solutions using AS4 protocol as per NC INT requires a certain development to be carried out in our system.