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Vienna, 21/04/2016

Subject: Consultation on Common Data Exchange Solution

Dear Madame/Sir,

We would like to thank you for the opportunity to respond to this consultation and to contribute to the appropriate implementation of Regulation 2015/703 (Interoperability Network code). However, we regret to observe that this process has been carried out without giving market players sufficient notice and only two weeks ahead of the implementation deadline.

Since entering the Austrian market in 2008, Shell has been using the KISS-A format sent via e-mail as the main data exchange format and channel. We highlight that this is a very fast, simple and effective way of communication. It is ideal especially for small shippers as KISS-A format is set-up of email communication, tabular and transparent. Also, we note that the email communication has never been problematic throughout this period.

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Notwithstanding the above, we understand the obligation to change the data exchange system to comply with the Interoperability Network Code entering into force 1st May 2016. In line with this Network Code any common data exchange solution in place between market participants as of May 21, 2015 may continue to apply subject to the approval of the regulator, provided that the existing data exchange solutions meet the respective security requirements as defined in article 22.

As we are currently using neither the AS2 system, which has been proposed as temporary solution, nor AS4, we are not able to implement any of them in such a short period of time. In fact, both protocols represent very demanding and expensive solutions. We note that none of the neighboring TSOs currently demands the AS4 protocol, e.g. the Slovak TSO Eustream uses email communication and KISS-A format, the Czech TSO net4gas allows web nomination.

On this backdrop, we deem that the only changes strictly necessary by May 1st 2016 would be those addressing the security concerns, while different communication options (including the existing ones) should remain open to network users.

If GCA and TAG insist on using AS2 or AS4 only, we would need a transition period of at least 12 months. This period would be necessary inter alia to:

- Start the tender for choosing a provider
- Change internal data flows
- Test new data exchange system

As a matter of fact, if the AS2/AS4 protocols were to stay as the only possible way of communication starting from May 1st 2016, we would have to stop transporting gas from Germany and to Italy and Slovakia.

Should you have any question or require any additional clarification with respect to the above, we would be available to meet and/or discuss further our views.

Yours sincerely

Shell Energy Europe Limited



Davide Rubini

Regulatory Affairs Manager