

EU Network Code Implementation Project

Frequently Asked Questions

Version 3.0



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1. Introduction

This “*Frequently Asked Questions*” document has arisen from consultations with Shippers and is designed to be a resource for Shippers seeking information on the various processes affected by the European Network Codes.

Please note that this is a live document and the questions contained herein will be updated regularly over the coming months.

Please be advised that this is not a legal document, and where there is any discrepancy between this document and the Code of Operations, or between this document and any published Business Rules, the Code and the Business Rules will take precedence.

1.1. New Questions

Please note that any new or modified questions since Version 2.0 of this document are highlighted in red.

2. General

2.1. CAM Network Code: Background and Scope

1. What is the CAM Network Code?

The CAM (Capacity Allocation Mechanisms) Network Code (Regulation EU 984/2013) is a European Regulation which establishes a common rules for the allocation of gas capacity at cross-border points between European Member States.

2. Why is the CAM Network Code required?

Regulation EU 984/2013 (Capacity Allocation Mechanisms - CAM) aims to contribute to the European Commission’s vision for a European internal energy market by facilitating open and non-discriminatory access to transmission infrastructure, thus lowering transaction costs for cross-border trade. More specifically, the CAM Network Code establishes a common methodology for the allocation of capacity to network users at cross-border points between Member States (Interconnection Points).

3. How did the CAM Network Code come about?

Regulation EC 715/2009 (on conditions for access to the natural gas transmission networks) established the European Network of Transmission System Operators for Gas (ENTSOG) and prescribed a list of Network Codes to be developed by ENTSOG, including in the area of ‘capacity allocation’. Accordingly, the Network Code on Capacity Allocation Mechanisms (CAM) was developed, approved, and ultimately published in the form of Regulation EU 984/2013 in October 2013.

4. What are the key features of the CAM Network Code?

The key features of the CAM Network Code include the following:

Capacity Auctions:

capacity at interconnection points is to be sold by means of an auction process, with auctions at each interconnection point taking place simultaneously across Europe in accordance with a harmonised auction calendar, save where expressly stated otherwise.

Standardised Capacity Products:

a suite of 'standard capacity products' is to be offered at all interconnection points in the form of annual (up to 15 years ahead), quarterly, monthly, day ahead and within-day capacity products.

Bundled Capacity:

whereas currently each TSO at an interconnection point sells its capacity independently (e.g. Gas Networks Ireland sells Moffat Entry Capacity to Irish Shippers and National Grid sells NTS Exit Capacity to NTS Shippers), the Regulation requires capacity at interconnection points to be offered as a single 'bundled' product, with a single 'bundled' tariff, and allocated to a single Shipper.

Capacity Booking Platform:

Capacity at interconnection points will be offered on PRISMA, which is a 'joint web-based booking platform'.

Gas Day:

The gas day across Europe is being harmonised such that the gas day will be 05:00 to 05:00 (local time) as opposed to the current gas day of 06:00 to 06:00.

5. When must the CAM Network Code be applied?

The Regulation has an implementation date of **1 November 2015**.

Note: notwithstanding the implementation date above, the gas day will change on **1 October 2015** to coincide with the start of the gas year.

6. Where must the CAM Network Code be applied?

The CAM Network Code is to be applied at all Interconnection Points (cross-border points or points between adjacent entry/exit systems).

7. What is an Interconnection Point?

An Interconnection Point is defined in article 3(10) of the Regulation as follows:

'interconnection point' means a physical or virtual point connecting adjacent entry-exit systems or connecting an entry-exit system with an interconnector, in so far as these points are subject to booking procedures by network users;

8. What are the Irish Interconnection Points?

- **Moffat Entry Point:** the point of interconnection with the National Transmission System (NTS) in Great Britain; and
- **South North Connected System Exit Point** at Gormanston: the point of interconnection with the GNI (UK) (formerly BGE(NI)) system in Northern Ireland.

9. Will the CAM Network Code apply at all Irish Entry and Exit Points?

No.

The CAM Network Code only applies at Interconnection Points (Moffat Entry Point and South North Connected System Exit Point (Gormanston)) and will not apply at other Entry or Exit Points such as Inch and Corrib at this time.

10. What's the logic of not offering a quarterly exit product to match with the quarterly entry product?

As per Question 9, the CAM NC does not apply at non-IP's. As the current focus remains on NC compliance for Oct/Nov 2015 GNI chose to only apply the changes required from the regulation at this time. This may be reconsidered at a later stage i.e. apply network codes at the non-IPs.

11. Is there potential to move the timing of the Transporter's NDM forecast so that it would be received by Shippers before the close of the within-day Capacity auction window?

Yes, an amendment has been made to issue the final forecast at 23.30 on Day D.

2.2. CAM Network Code: Key Concepts & Features

12. What is bundled Capacity?

Bundled Capacity is a capacity product at an Interconnection Point which comprises exit capacity from one TSO's network and entry capacity to the adjacent TSO's network. It is a single product, sold jointly by the adjacent TSOs on a joint capacity booking platform at a single tariff.

Using the Moffat Entry Point as an example, Moffat bundled capacity is comprised of NTS Moffat Exit Capacity and Gas Networks Ireland Moffat Entry Capacity.

13. What is unbundled Capacity?

Unbundled Capacity is capacity at an Interconnection Point which is offered by one TSO only. This is akin to the existing Entry and Exit products offered by the TSOs at a cross-border point.

Using the Moffat Entry Point as an example, unbundled capacity at Moffat would include two separate products:

- NTS unbundled Moffat Exit Capacity; and
- Gas Networks Ireland unbundled Moffat Entry Capacity

Capacity booked prior to the introduction of CAM in November 2015, is considered unbundled capacity.

14. Will Gas Networks Ireland offer unbundled capacity at auctions?

Unbundled capacity may be offered by a TSO at an IP when a technical capacity mismatch occurs with the Adjacent TSO. Each TSO at an IP submits their Available Capacity to PRISMA and PRISMA offers the lesser amount as Bundled Capacity. The TSO with the greater capacity may offer this excess capacity as unbundled capacity in an auction.

Given the technical capacity difference at Moffat, it is not foreseen that GNI will offer unbundled capacity.

15. When PRISMA is introduced, will GTMS be discontinued?

No.

GTMS will continue to be the Transporter's primary IT system for booking capacity and management of Shipper nominations at all points which are not Interconnection Points.

Additionally, GTMS will interface with PRISMA as follows:

- Upload TSO specific information to PRISMA in advance of each auction;
- Receive auction result information from PRISMA after each auction; and
- Update Shipper capacity information on GTMS as a result of auctions and secondary capacity trades which take place on PRISMA.

16. If I need Capacity at an Irish Interconnection Point, where do I apply?

PRISMA.

All Capacity at Interconnection Points will be offered and allocated on PRISMA.

17. If I need Capacity at an Entry Point which is not an Interconnection Point, where do I apply?

GTMS.

All Capacity at points other than Interconnection Points will be offered and allocated on GTMS.

18. If I need Capacity at an Exit Point, where do I apply?

GTMS.

All Capacity at points other than Interconnection Points will be offered and allocated on GTMS.

19. Will it be possible to trade bundled capacity at an Interconnection Point? If so, on which IT system?

Yes. Interconnection Point Capacity (bundled) can be traded with other Shippers on PRISMA.

Note: bundled capacity may only be traded as bundled capacity i.e. bundled capacity may not be broken down to its constituent parts to be traded as unbundled capacity.

20. Will it be possible to trade unbundled capacity at an Interconnection Point? If so, on which IT system?

Yes. Interconnection Point Capacity (unbundled) can be traded with other Shippers on PRISMA.

Note: bundled capacity may only be traded as bundled capacity i.e. bundled capacity may not be broken down to its constituent parts to be traded as unbundled capacity.

21. If I buy bundled capacity at an Interconnection Point, can I subsequently trade this capacity as unbundled capacity on the secondary market?

No.

Bundled capacity may only be traded as bundled capacity i.e. bundled capacity may not be broken down to its constituent parts to be traded as unbundled capacity.

22. I am aware that the Capacity Allocation Mechanisms (CAM) Network Code (Regulation EU 984/2013) has an implementation date of 1 November 2015. What are the key impacts of the Regulation from an Irish (Shipper) perspective?

The following table highlights the key features / impacts of CAM for the Irish gas market. For the purposes of comparison, the Moffat Interconnection Point is used as an illustrative example below:

	Pre-CAM	Post-CAM
How is capacity offered for sale?	<ul style="list-style-type: none"> • 2 x separate ‘unbundled’ capacity products offered in GB & RoI: • GB Exit Capacity offered in GB by National Grid; and • RoI Entry Capacity offered in RoI by Gas Networks Ireland 	<ul style="list-style-type: none"> • 1 x single ‘bundled’ capacity product offered jointly by TSOs: • GB Exit & RoI Entry will be sold together (bundled) to form single product • Irish Shippers must be licenced in GB to book ‘bundled capacity’ • No unbundled capacity available except in event of a technical capacity mismatch
Where is capacity offered and allocated?	<ul style="list-style-type: none"> • Separately on each TSO’s IT system: <ul style="list-style-type: none"> ○ On GTMS¹ in RoI ○ On Gemini in GB 	<ul style="list-style-type: none"> • Jointly by both TSOs on single pan-European booking platform (PRISMA)
When is capacity offered for sale?	<ul style="list-style-type: none"> • On a rolling basis as per requirements of Irish market • Flexible timelines (and short lead times) for Irish Shippers to acquire capacity 	<ul style="list-style-type: none"> • Fixed auction times / dates as per centralised European auction calendar • More restrictive timings (and longer lead times) for Irish Shippers to acquire capacity
How is capacity sold /allocated?	<ul style="list-style-type: none"> • Capacity allocated on principle of ‘first come first served’ 	<ul style="list-style-type: none"> • Auction algorithms (identical algorithms across Europe) based on principle of ‘willingness to pay’
Gas Day	06:00 - 06:00	05:00 – 05:00. change ensures that gas day is aligned across the European time zones

23. When will the gas day change come into effect?

1 October 2015.

¹ GTMS is an IT system for managing capacity bookings on the Irish transmission network. Gemini is an equivalent system for the GB network.

The gas day will change from 06:00 – 06:00 to 05:00 – 05:00 UTC and from 4:00 to 4:00 UTC the following day when daylight saving is applied.

24. When will the first PRISMA auction take place for an Irish Interconnection Point?

Product	First Auction Date	First Capacity Effective Date
Within-Day	31 st October 2015	1 st Nov 2015
Day-Ahead	31 st October 2015	1 st Nov 2015
Monthly	November 2015	1 st December 2015
Annual	March 2016	1 st October 2016
Quarterly	June 2016	1 st October 2016, 1 st January 2017, 1 st April 2017, 1 st July 2017

25. When is the last time I can book Entry Capacity at an Interconnection Point on GTMS under the existing Code rules?

See below:

Product	GTMS		PRISMA	
	Last Capacity booking request on GTMS	Last Capacity Effective Date	First CAM Auction Date	First Capacity Effective Date
Within-Day	03:00 31 st October 2015	05:00 31 st Oct 2015	31 st Oct 2015	1 st Nov 2015
Day-Ahead		05:00 31 st Oct 2015		
Monthly	04:59 hours on the Day which is eight days prior to 1 November 2015	05:00 1 st Nov 2015	November 2015	1 st Dec 2015
Annual	Sep 2015	Variable (as per transitional arrangements)	March 2016	1 st Oct 2016
Quarterly	N/A	N/A	June 2016	1 st Oct 2016,

				1 st Jan 2017, 1 st Apr 2017, 1 st July 2017
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26. I have an existing Entry Capacity booking at an Interconnection Point with an end date later than 30 September 2015. Can I still use this capacity? What are my options?

Yes. You may continue to use that capacity as usual under the existing Code rules, up until its expiration date. However in August/September 2015 the TSO will provide Shippers which hold existing Annual Capacity Bookings at Interconnection Points with a number of options. These Shippers may:

- Request a new Annual Capacity booking to be created which will modify the amount of capacity booked.
- Take no action in regard to their booking, thus maintaining their existing level of Capacity.

Note: For a more detailed account of these transitional arrangements please see Section 3 of [Transitional Arrangements Business Rules](#).

3. Capacity

3.1. PRISMA

3.1.1. General Queries

27. What is PRISMA?

PRISMA is a company set up by a group of European TSO's on 1 January 2013 to provide a Capacity Booking Platform for use at Interconnection Points and designed to meet the requirements of the Capacity Allocation Mechanism Network Code (CAM NC).

28. What contractual relationship will a Shipper have with PRISMA?

The only contractual relationship between a Shipper and PRISMA is that a Shipper is required to accept the PRISMA General Terms and Conditions (GTC's) to be able to use the platform. The GTC's define the terms of use of the platform for Shippers and their users.

When a Shipper buys capacity on PRISMA, it enters into a contractual relationship with the TSO via the Code of Operations (as is currently the case when capacity is booked by a Shipper on GTMS)

29. What contractual relationship will a TSO have with PRISMA?

At a minimum a TSO will sign a Service Level Agreement (SLA) with PRISMA. This SLA allows the TSO to use the PRISMA Capacity Booking Platform at each of its Interconnection Points (IP). TSO's

also have the option to become a shareholder in the PRISMA company giving them greater input to the decision making process with respect to the company and the future development of the platform.

30. How much will it cost a Shipper to register with PRISMA?

There is no direct cost to Shippers to register with PRISMA or to use the platform. All costs in relation to provision and maintenance of the platform are to be paid to PRISMA by the TSO by way of an annual fee.

31. What functions will PRISMA perform at an Irish Interconnection Point?

PRISMA will perform the following functions at Irish Interconnection Points:

- Primary Capacity:
 - facilitate the offer and allocation of bundled capacity; and
 - facilitate the offer and allocation of unbundled capacity (to the extent offered / available)
- Secondary Capacity:
 - Facilitate the trading of bundled capacity on the secondary market; and
 - Facilitate the trading of unbundled capacity on the secondary market (to the extent unbundled capacity remains)]

PRISMA will **not** for example:

- Offer / allocate capacity at points other than Interconnection Points;
- Invoice Shippers for capacity allocated on PRISMA (TSOs will issue invoices);
- Facilitate the submission of nominations

32. Will PRISMA invoice a Shipper for Capacity allocated to it in an auction?

No.

PRISMA will not issue invoices and no payments are due to PRISMA. PRISMA is simply the platform on which TSOs sell their capacity. The TSO (or TSOs) remain the parties who will issue invoices and who are payable in respect of capacity allocated to Shippers on PRISMA.

33. Will a Shipper be required to post financial security with PRISMA?

Shippers will not have to post financial security directly with PRISMA. Shippers will be required to post financial security with their own TSO and may then use that financial security to take part in PRISMA auctions.

34. Will PRISMA manage nominations at the Interconnection Points?

No. PRISMA will not manage nominations at the Interconnection Points.

35. Can a Shipper appoint an agent to participate in auctions on its behalf?

Yes.

A Shipper may nominate multiple ‘users’ on PRISMA who are authorised by the Shipper to participate in auctions on behalf of the Shipper. As part of the PRISMA registration process (section 3.1.2) the Transporter will seek confirmation from the Shipper that each user is authorised on its behalf, as per question 48.

36. If a Shipper appoints an agent, does the Gas Networks Ireland Code of Operations require that the agent holds a Shipper licence?

No.

In terms of the PRISMA registration process, the Transporter will seek confirmation from the Shipper that each ‘PRISMA user’ is authorised on its behalf. Effectively, the ‘agent’ is operating on behalf of the Shipper.

Similarly, for an agent to carry out other actions in respect of the Gas Networks Ireland Code of Operations (i.e. on GTMS) on behalf of a Shipper, it is not necessary for that agent to have a Shipping licence, provided that the agent carries out the activities under the ‘log-in’ details of the Shipper.

37. Is the PRISMA auction the only way of buying Capacity at Moffat?

From 31 October 2015 the only way to buy Capacity at Moffat will be via the PRISMA Platform. This is a requirement of the CAM Network Code.

38. On PRISMA, is the NI Capacity separate from ROI Capacity?

Yes there are two separate auctions;

1. For Shipper wishing to transport gas from GB to ROI they must register with NGG & GNI on PRISMA.
2. For Shipper wishing to transport gas from GB to NI they must register with NGG & PTL on PRISMA

If a Shipper is registered with National Grid, PTL and Gas Networks Ireland, that Shipper will have the option to participate in two separate auctions for each category i.e. NI day-ahead, within-day, monthly, quarterly and annual auctions & ROI day-ahead, within-day, monthly, quarterly and annual auctions;

39. Does a Shippers dashboard on PRISMA update in real time?

Yes and it will show bids by other member of your organisation;

40. Is it possible to assign different users in an organisation different levels of access on PRISMA?

No. Each user will have the same form of access, there is no option for restricted usage.

41. What is the lead time to the allocation of capacity purchased on PRISMA to Shippers?

Product	Bid Window	Results Available
Annual Capacity Quarterly Capacity	1 st window starts on the hour (as per auction calendar for LT)	No later than the following business day (once final bidding)

Monthly Capacity	products, currently 09:00 CET) with a duration of 3hrs. Any subsequent bidding rounds are for a duration of 1hr.	round is closed) on PRISMA. The results will be available shortly after this.
Day Ahead	15.30-16.00 on Day D-1	Results available on PRISMA up to 59min after auction window starts. The results will be available shortly after this.
Within-Day	One auction window starting on the hour every hour, with a duration of 30min.	Results available before the top of the next hour (up to 59min after auction window start) on PRISMA. The results will be available shortly after on GTMS.

42. If a technical issue arises with PRISMA and the system is unavailable, how would Shippers make Capacity bookings?

In the event that a Shipper is unable to participate in PRISMA auctions due to technical issues on the platform, the TSO will provide Shippers with an alternative process where Capacity can be booked until such time that the platform issues have been resolved.

3.1.2. PRISMA Registration Process

43. How do I register with PRISMA in order to participate in auctions at Irish Interconnection Points?

The registration process involves three main steps:

1. **Initial Application Form** - Complete PRISMA Shipper application form on the PRISMA website. This information is then forwarded to the TSO for the next stage in the registration process.
2. **TSO Validation of Shipper** - Gas Networks Ireland will validate that the applicant is an Irish Shipper and has signed a framework agreement in respect of the Gas Networks Ireland Code of Operations. Gas Networks Ireland will then inform PRISMA that it has validated the Shipper; and
3. **Delivery of Security Key (fob)** - Following validation of the Shipper by Gas Networks Ireland, PRISMA processes the final stage in the issues log-in details and a security key / fob to the Shipper.

Note that in order to take part in bundled auctions, it will be necessary to be validated by both TSOs. However, the validation of one TSO is sufficient for PRISMA to issue the log-in details and security key / fob.

44. How long should I allow to go through the PRISMA registration process?

Please allow **a minimum of 10 weeks** to complete the process from start to finish.

The estimated times to complete the various stages of the process are as follows:

1. **Initial Application Form** - 1 day
2. **TSO Validation of Shipper** - max 10 business days
3. **Delivery of Security Key (fob)** - max 8 weeks Gas Networks Ireland, PRISMA processes the final stage in the issues log-in details and a security key / fob to the Shipper.

45. How long will it take to complete the initial registration form on the PRISMA site?

Completing the application process will only take about 20 minutes provided you have the relevant information to hand.

Please ensure that you have a valid international **Energy Identification Code (EIC)** which can be obtained from the Irish Local Issuing Office (LIO) operated by Eirgrid. For further information on EICs, please refer to the next section 3.1.3 'Energy Identifier Codes'.

46. What information will be required on the initial registration form on the PRISMA site?

There are five steps in the registration process

1. Company Information
 - a. Company Name,
 - b. Address,
 - c. Bank name, IBAN, BIC,
 - d. EIC
 - e. VAT No.
2. Contacts
 - a. Two dispatching contacts
 - i. Name, email, phone, backup phone number, and Fax
 - b. Billing contact
 - c. Communications contact
 - d. Operations contact
3. User Information
 - a. Name, phone, email, and language
4. Assignment of TSO
 - a. Click on the GNI icon and tick the box accepting the T&Cs
5. Check Information

Please note that the first user to register for a company will register both themselves as a user and the Shipper Company as well. Subsequent users will not be required to complete Step 2 Contacts.

47. When will GNI be registered as the Irish TSO on PRISMA?

Gas Networks Ireland became the Irish TSO on 1 August 2015. The change of TSO on PRISMA took place on the same day.

48. Does the TSO or TSOs have a role in the registration of a Shipper or Shipper users on the PRISMA platform?

Yes.

Initially one TSO will need to validate the Shipper before PRISMA will issue log-in details and security key / fob to the Shipper.

In order for a Shipper to participate in bundled auctions at an interconnection Point, both TSOs will have to validate the Shipper.

Additionally, after the 'Shipper' has been registered on PRISMA, multiple 'users' may request access to PRISMA in order to participate in capacity auctions on behalf of the Shipper. In each instance, Gas Networks Ireland will require the Shipper to authorise each individual 'user' before Gas Networks Ireland will approve the user.

3.1.3. Energy Identifier Codes (EIC's)

49. What is an EIC?

An Energy Identification Code (EIC) is a unique code used to identify different objects and parties related to the European Internal Energy Market. The scheme is supported by a Central Issuing Office (CIO, ENTSO-E's Secretariat) and ENTSO-E authorised Local Issuing Offices (LIO). These LIO's are Electricity and Gas Transmission System Operators along with some third parties such as ENTSOG.

50. What do I require when applying for EIC?

The following is the information required of a company when applying for an EIC:

- Company Name
- Address
- Valid EU VAT Code
- Contact Person for EIC Matters
- Telephone Number
- Fax Number
- e-mail address of EIC contact person
- Company function(s)
- Request made by
- Function
- Signature

51. I am not a Shipper at any Interconnection Point (IP), do I need an EIC?

Not being a Shipper at an IP means that you will not need to register on PRISMA therefore you will not need an EIC for this purpose. However, you may need an EIC for other purposes such as reporting of Transparency information under REMIT.

52. Do I need an EIC if I am not planning on buying or Trading Capacity at Moffat until sometime in 2016?

Even though you may not be planning to buy or trade Capacity at Moffat until 2016, you may require an EIC sooner if you will be submitting nominations for Moffat. The EIC will be used as the identifier by GNI and National Grid in their IT systems to identify Shippers at Moffat.

53. Where can I get an EIC?

An EIC can be obtained from the [Local Issuing Office](#) in Ireland, operated by Eirgrid.

An EIC can also be obtained from the European Network of Transmission System Operators for Gas (ENTSO-G), through their EIC office, details of which can be found under the EIC CODES section of the [ENTSO-G Website's](#) main menu.

54. Do I need an EIC to participate in an auction on PRISMA?

Yes. In order to participate in an auction on PRISMA you must first be registered with PRISMA, for which you will require an EIC.

In order to participate in a bundled auction a party must have an International EIC, i.e. the party must be the same legal entity on both sides of the IP.

55. What type of EIC is required by PRISMA?

There are a number of different types of EIC's covering such areas as Entity (Party), Area Code, Measurement Point, Location. For a Shipper to register with PRISMA, PRISMA requires the shipper to have a Party Code. The shipper is also required to ensure that the Party Code is registered as an International Party code. These code are issued to entities trading in more than one jurisdiction and will be listed on the [ENTSO-E website](#).

Party Codes can be readily identified as they have the letter 'X' as the third character of the code.

56. What will PRISMA validate when checking an EIC?

PRISMA will check that the EIC is a valid international Party EIC listed on the ENTSO-E website. It will also validate that the company name submitted in the application matches that on the ENTSO-E list.

57. Will the TSO also validate my EIC I have used on PRISMA?

No.

The TSO will not validate the EIC used in the PRISMA registration process because PRISMA will have already validated it.

58. How can I tell if my EIC is local or international?

All International EIC's are listed on the [ENTSO-E website](#). If your EIC is listed on this website it is an international EIC, if it is not listed on this website it is a local EIC.

59. What is the difference between a local and International EIC? Are they interchangeable?

Local EIC's are issued to parties trading only in a single jurisdiction. These codes are generally required for reporting on Transparency platforms such as REMIT.

International EIC's are required of entities who trade in more than one jurisdiction. With the introduction of the CAM Network Code, all shippers at an Interconnection Point will be required to be registered shippers in the jurisdiction on either side of the IP.

For example at Moffat a shipper will need to be registered in both Ireland and the UK and therefore will be required to hold an International EIC to allow them register with PRISMA.

60. I have an EIC issued by the Irish LIO but it also appears on the ENTSOE published list. Is this considered an international EIC? Will PRISMA accept this?

Yes, the Irish Local Issuing Office can issue International Party Codes. All International Party Codes are automatically published on the ENTSO-E website.

Once a code is a valid International Party Code, PRISMA will accept it, irrespective of where that code was issued.

61. Which list does PRISMA check when validating an EIC? ENTSOE only or all local LIO lists?

PRISMA only validates EIC's on the [ENTSO-E list](#). Because PRISMA requires a valid International EIC, It only checks the ENTSO-E list and does not check the list of the Local Issuing Office.

62. What's the relationship between ENTSOE list and local lists? Does ENTSOE regularly (and how frequently) update its list based on local lists?

Local Issuing Offices (LIO) maintain a list of all EIC's that they create, irrespective of whether these codes are local or international. They do not maintain a list of EIC's created by other LIO's. ENTSO-E maintain a central list of all International EIC's whether these were issued by an LIO or the Central issuing Office operated by ENTSO-E. ENTSO-E do not maintain a list of local EIC's issued by Local Issuing Offices.

63. I have an EIC issued by the Irish LIO, is this sufficient for PRISMA purposes?

Irrespective of whether the EIC is issued by the Irish LIO or the Central Issuing Office operated by ENTSO-E, it must be an International Party EIC for use in PRISMA. Therefore, an EIC issued by the Irish LIO will be sufficient for PRISMA purposes as long as it is an International EIC.

64. I am a licenced Shipper on both sides of an IP and hold two different EICs (and intend to acquire bundled capacity on PRISMA). Should I submit one or two EICs to PRISMA?

When registering on PRISMA, a Shipper should only submit a single EIC. It is preferable that the EIC being submitted to PRISMA be the EIC issued at the company's home Local Issuing Office (LIO). However, PRISMA will not reject another EIC as long as it is an International EIC and listed on the [ENTSO-E list](#) of Party Codes.

65. I am a licenced Shipper on both sides of an IP and do not have an EIC currently. Where should I apply for my EIC?

A Licensed Shipper on both sides of an IP should apply for its EIC at the Local Issuing Office in its home country e.g. An Irish company that is a licensed shipper on both sides of an IP should apply for an International EIC at the [Local Issuing Office](#) in Ireland.

3.2. Primary Capacity (Products & Auctions)

66. What capacity products will be offered on PRISMA?

Annual, quarterly, monthly, daily and within-day capacity will all be available on PRISMA. Day-ahead VRF will also be available.

67. Are there any new capacity products being introduced?

A new Quarterly Capacity product will be available at Interconnection Points. A Quarterly product will not be available at points other than Interconnection points.

68. How will capacity products be sold and allocated on PRISMA?

Products will be sold by means of two separate Auction types;

- Ascending Clock Auction;
 - Annual, quarterly and monthly capacity
- Uniform Price Auction;
 - Day-ahead and within-day capacity

Note: For a more detailed account of the Auction Process and how each of the auction algorithms work, please see Section 4 of the [CAM Business Rules](#).

69. How does an ‘ascending clock auction algorithm’ work?

Ascending Clock Auctions enable Shippers to place bids for IP Capacity in successive Bidding Rounds at pre-defined prices, starting with the Reserve Price. Where demand exceeds supply in the first round, the price shall increase in each subsequent bidding round until the demand for IP Capacity has reduced so that bids can be allocated in full.

For more detail on this process, please see section 4.3 of [CAM Business Rules](#).

70. How does a ‘uniform price auction algorithm’ work?

In a uniform price auction, there is a single Bidding Round in which the Shipper bids price as well as capacity amount.

For more detail on this process, please see section 4.7 of [CAM Business Rules](#).

71. Will all Shippers allocated capacity in an auction pay the same price?

Yes.

- In an Ascending Clock auction: Shippers do not bid price. All prices are pre-determined for all bidding rounds.
- In a Uniform Price auction: All Shippers pay the price of the lowest successful bid.

72. What is the latest time I can bid for Within-Day Capacity?

Within Day capacity bids may be submitted in a series of bid windows. The first of these is from 18.00 on Day D-1, and the last bid window closes at 00.30 on Day D.

73. When will capacity products be sold on PRISMA?

All capacity products will be sold in accordance with an Auction Calendar. This calendar is published by ENTSOG by January every year.

The schedule for IP Capacity auctions are listed in the table below.

Product	Auction Date	Products Available
Annual	March Each Year (once annually)	Years Y+1 to Y+15
Quarterly	June Each Year (once annually - all 4 quarters auctioned simultaneously)	4 Quarters in Y+1
Monthly	Rolling Monthly Auction – 2 nd Monday each month	Month M+1
Day-Ahead	Day D-1	Daily Capacity
Within-Day	18.00 D-1 to 00.30 D	Daily Capacity

74. Can the Irish Regulatory Authority or TSO amend the times & dates of the PRISMA auctions?

No.

The auction dates are set for the entirety of Europe by ENTSOG on an annual basis.

75. The existing Annual Capacity product in the Gas Networks Ireland Code can be booked with a start date of the first day of any calendar month, and can be requested up to 7 days prior to the effective date. Will this change with the introduction of PRISMA auctions at Interconnection Points?

Yes.

The Annual Capacity product **at Interconnection points**:

- May only be booked once annually (auction in March);
- Has a duration of a 'gas year', starting on 1 October and ending on 30 September (i.e. it is a 'gas year products as opposed to a '12-month' product

The Annual Capacity product **at points other than Interconnection points** remains unchanged and is as per the existing Code rules.

76. There is typically 30 – 60 minutes during which I may submit a bid in an auction. This presents a risk in terms of error or omission. Is there an option whereby I can submit bids in advance?

Yes.

Shippers may submit an Automatic Bid Profile in advance of a given IP Capacity auction. Each individual bid included in the Shipper's Automatic Bid Profile shall be automatically entered as a bid in the relevant Bidding Round and shall be treated the same as bids submitted manually.

77. I have been notified that I have been allocated capacity in a PRISMA auction. What does this mean?

This means that one or more of your submitted bids was successful in procuring capacity at the IP. This represents a binding commitment on the Shipper in terms of entering a capacity contract and the associated obligation to pay for such capacity.

In the case of bundled capacity, a Shipper enters into two separate agreements, one with each TSO. The Shipper will be invoiced separately by each TSO in respect of such capacity.

78. If I make an error in submitting a bid in PRISMA, can I rectify this error?

Bids may be modified or withdrawn up to the close of the relevant Bidding Round. Once the relevant Bidding Round closes, no modification, withdrawal or variation to valid bids shall be accepted. Any capacity allocated on this basis represents a binding commitment and cannot be reversed.

3.3. Secondary Capacity

79. Will it be possible to trade bundled capacity on the secondary market at an Interconnection Point? If so, on which IT system?

Yes.

Interconnection Point Capacity (bundled) can be traded with other Shippers on PRISMA.

Note: bundled capacity may only be traded as bundled capacity i.e. bundled capacity may not be broken down to its constituent parts to be traded as unbundled capacity.

80. Will it be possible to trade unbundled capacity on the secondary market at an Interconnection Point? If so, on which IT system?

Yes.

Interconnection Point Capacity (unbundled) can be traded with other Shippers on PRISMA.

Note: bundled capacity may only be traded as bundled capacity i.e. bundled capacity may not be broken down to its constituent parts to be traded as unbundled capacity.

81. If I buy bundled capacity through a PRISMA auction at an Interconnection Point, can I subsequently sell this capacity as unbundled capacity on the secondary market?

No.

Bundled capacity may only be traded as bundled capacity i.e. bundled capacity may not be broken down to its constituent parts to be traded as unbundled capacity.

82. I am aware that PRISMA facilitates a number of different secondary capacity models from which to choose. Are all these models available at Irish Interconnection Points?

PRISMA facilitates the following secondary capacity trading procedures:

- OTC - Over The Counter; and
- FCFS - First Come First Served; and
- CFO - Call for Orders

Gas Networks Ireland proposes to utilise the OTC trading procedure only as this is the procedure used currently in the Gas Networks Ireland Code of Operations. The other two procedures will not be available to Irish Shippers.

While PRISMA as an IT system offers functionality to support each of the above procedures, it is for each Member State / Regulator / TSO to determine which of these are supported by the regulatory rules in that Member State.

83. I am aware that PRISMA facilitates a 'transfer of use' and 'assignment' models in terms of secondary capacity trades. Are both these models available at Irish Interconnection Points?

Gas Networks Ireland proposes to utilise the ‘transfer of use’ transaction type only as this is the model used currently in the Gas Networks Ireland Code of Operations. The ‘assignment’ transaction type will not be available to Irish Shippers.

While PRISMA as an IT system offers functionality to support both transaction types listed above, it is for each Member State / Regulator / TSO to determine which of these models are supported by the regulatory rules in that Member State.

84. What is the latest time I can request a secondary capacity trade at an Irish Interconnection Point?

The CAM business rules originally proposed a deadline of 00:45 (this was based on the existing deadline of 01:45, adjusted by 1 hour in line with the gas day change).

This deadline has now been modified to 03:00 in order to align with National Grids deadline at the request of Irish Shippers.

85. Who approves / rejects my request?

Assuming that two Shippers have agreed the terms of a trade bilaterally and have subsequently ‘created the trade’ on PRISMA, the relevant TSOs are required to validate the trade:

- In the case of bundled capacity, both TSOs are required to validate the trade. Should either TSO reject the trade, the trade will not be approved; and
- In the case of unbundled capacity, only one TSO is required to validate the trade.

Gas Networks Ireland’s trade validation criteria are include in modification proposal A062 ‘CAM’

National Grid’s trade validation criteria are include in modification proposal UNC 0500

86. When submitting a secondary trade should the counterparty submitted be an individual or a company?

The counterparty must be a company, with an EIC.

87. What are the legal implications if a Shipper does not specify the price of a secondary capacity trade on PRISMA?

In order to submit a secondary capacity trade on PRISMA Shippers must specify the price of the trade. Shippers must also confirm that the information they have entered is accurate prior to submitting the trade.

However it is possible for TSO’s to configure secondary trading settings on PRISMA so the price of the trade will only ever be visible to the parties involved (and the TSO/Adj TSO’s). This configuration will need to be agreed upon and completed by adjacent TSOs.

88. Can I still utilise Entry Point Transfers should I wish to transfer Capacity from an Interconnection Point to a new Entry Point?

Entry Point Transfers cannot be used in respect of bundled capacity.

However, Entry Point Transfers may be used in respect of unbundled capacity. It should be noted that in order for a Shipper to utilise Entry Point Transfers post October / November 2015, the Shipper must have acquired unbundled capacity in advance of October / November 2015. This is due to the fact that GNI are unlikely to offer unbundled capacity at Interconnection Points' post 1 November 2015 as a result of the TSO's obligation to bundle capacity.

89. Will the Back-up Entry Capacity product still be available?

No.

As per CAM Business Rules 6.1.17, Back-Up Entry Capacity is to be discontinued as of 1 October 2015.

'The rationale for introducing the Back-up Entry Capacity product was to provide a form of security to Shippers holding Capacity at production connected Entry Points and to ensure that new production Connected Entry Points were not disadvantaged as a result of any perceived risk associated with production connected Entry Points. The Back-up Entry Capacity product was introduced before short term capacity products were established. Given the incompatibility of the product with bundled capacity, coupled with the availability of short term products, it is proposed that the Back-up Entry Capacity product be removed entirely from the Code, including at Entry Points which are not Interconnection Points.'

90. Can capacity transfers on PRISMA be transferred onwards to other Shippers?

Yes.

Code Modification A060 will apply at IP's as well as non-IP's. This facilitates the trade of 'secondary capacity', i.e. capacity which has previously been subject to a trade, may be subsequently traded again.

91. Will interruptible capacity be offered at the same time as firm capacity?

For forward flows, only firm Capacity will be sold at the IP's until such time as firm Capacity has been contracted fully. The Transporter does not foresee this situation occurring for some time and has therefore not systemised interruptible functionality.

From the 31st October '15, interruptible VRF Capacity will be available at the IPs on the PRISMA auction platform on a day ahead basis.

3.4. Tariffs

92. Why is it necessary to publish new tariffs as part of the implementation of the CAM Network Code?

There are a number of reasons that new tariffs are required as part of CAM implementation:

1. The **auction process** as prescribed by CAM requires the definition of the following to ensure that the auction algorithms function correctly:
 - a. Reserve price
 - b. Auction Premium
 - c. Large Price Steps
 - d. Small Price Steps

2. The ***bundling of capacity*** requires that the two adjacent TSOs combine their respective tariffs to create a single bundled tariff.
3. The requirement for a ***new Quarterly product*** necessitates a new tariff (or seasonal multiplier) to be created.

93. Is the Tariff Network Code being implemented as part of the current Network Code implementation project (i.e. for Oct/Nov 2015)?

No.

The tariff changes being proposed for 2015 / 2016 arise as a result of the CAM Network Code (as outlined in Question 92 above).

The Tariff Network Code is still under development in Europe and is not expected to be implemented until 2017 or 2018 (TBC). Implementation of the Tariff Network Code is not part of the current Network Code implementation project for Oct / Nov 2015.

94. Does the CAM Network Code require changes to the tariff setting methodology?

No.

The CAM Network Code does not refer to any aspects of tariff setting methodology. However, a new transmission tariff methodology is currently the subject of a CER consultation (See Draft Decision Paper CER/15/057).

95. What is a 'reserve price' for a Capacity auction?

The reserve price of a given auction is effectively the regulated tariff as calculated by the TSO (as per its normal methodology) and approved by the Regulator.

In the case of ***bundled*** capacity, the reserve price will be the sum of the following (using Moffat as an example):

- Gas Networks Ireland regulated tariff for Moffat Entry; plus
- National Grid regulated tariff for Moffat Exit.

In the case of ***unbundled*** capacity, the reserve price (using Moffat as an example) will simply be equal to the Gas Networks Ireland regulated tariff for Moffat Entry.

96. What is an auction premium?

An auction premium is that amount over and above the reserve price at which capacity is allocated as a result of an auction.

97. What is a large price step?

Large price steps are set increments over and above the reserve price, which are applied in successive rounds of an ascending clock auction when demand exceeds supply.

98. What is a small price step?

Small price steps (being a fraction of a large price step) are set increments over and above the reserve price, which are applied in successive rounds of an ascending clock auction in order to minimise the amount of unallocated capacity.

99. In what currency will the tariffs be represented in PRISMA auctions?

The tariff information will be represented in Euro in PRISMA auctions

100. Annual Capacity auctions at Interconnection Points comprises of 15 separate and simultaneous auctions for Y+1 to Y+15. Will a tariff be set in advance of the auction for each of the 15 years?

The TSOs do not intend to predict the tariffs for each of the 15 years in advance of the auction. Instead a 'floating price' approach is likely to be adopted as follows:

- The reserve price will be 'floating' i.e. updated each year
- The annual tariff applicable in gas year Y+1 will be set in advance of the auction which takes place in gas year Y. Capacity allocated in respect of gas year Y+1 will be invoiced at the tariff set in gas year Y.
- This annual tariff will be used as the basis on which the auctions are run and capacity is allocated.

101. I've been allocated Capacity for gas year 2018/19 in an auction which took place in March 2016, where the reserve price in the auction was €20 and the auction premium was €2. How much will I pay for this capacity?

- By Feb 2016, the TSO sets the reserve price for gas year 2016/17 at €20.
- The auctions for all years (Y+1 to Y+15) were run on the basis of the €20 reserve price in March 2016.
- However, the annual tariff for gas year 2017/2018 is updated by the TSO by Feb 2017 to a new figure of €21. This is now the annual tariff which will be payable by the Shipper for gas year 2017/18.
- The Shipper will be billed for capacity on a monthly basis throughout gas year 2017/18 as follows:
- Total Capacity payment = €23; comprised of:
 - Regulated tariff for GY 2017/18 of €21; plus
 - Auction premium (fixed at time of auction) of €2

3.5. Billing

102. Will the billing of capacity change significantly with the introduction of CAM and PRISMA?

No.

Only minimal changes are required to the billing process and these changes are outlined in questions below.

103. I have been allocated capacity in a PRISMA auction. Will PRISMA issue an invoice in respect of this capacity?

No.

PRISMA will not issue invoices and no payments are due to PRISMA. PRISMA is simply the platform on which TSOs sell their capacity. The TSO (or TSOs) remain the parties who will issue invoices and who are payable in respect of capacity allocated to Shippers on PRISMA.

104. I have been allocated bundled capacity in a PRISMA auction. How will I be billed?

A Shipper who is allocated bundled capacity will receive two invoices (using Moffat as an example):

1. **Invoice from Gas Networks Ireland** in respect of that portion of the bundled tariff associated with the Irish regulated tariff (Moffat Entry); and
2. **Invoice from National Grid** in respect of that portion of the bundled tariff associated with the GB regulated tariff (Moffat Exit)

105. Currently, Gas Networks Ireland invoices for capacity on a monthly basis (invoices issued early in the month following the month in which the capacity was used). Will this change with the introduction of CAM and PRISMA?

No.

The Gas Networks Ireland billing timeline will not change. Shippers will be invoiced in month M+1 for their activity in month M.

3.6. Financial Security

106. Will the FS policy apply at Interconnection Points and Non-Interconnection Points?

Yes.

The purpose of the Financial Security Policy is to provide a framework for a Shipper to put Financial Security in place to meet its payment obligations to the transporter irrespective of whether these obligations were incurred at Interconnection Points or Non-Interconnection Points

107. Has anything changed at non-IP's in relation to Financial Security?

Yes.

The date that FS is required to be put in place by Shippers has changed for all Capacity products (i.e. Annual, Monthly & Daily) at non-IP's.

The following two tables detail the new requirements for FS in order to book capacity at IP's and non-IP's.

FS requirements at IP's.

Product	FS Required Date	FS Amount Required
Annual	8 Days prior to the Capacity effective date.	72 Days of Capacity charges, commodity charges and VAT.
Quarterly		
Monthly	8 Days prior to the Capacity effective date.	1 month of Capacity charges, commodity charges and VAT.

Day-Ahead and Within-Day	FS required prior to the confirmation of the capacity booking.	1 day of Capacity charges, commodity charges and VAT
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FS requirements at non-IP's.

Product	FS Required Date	FS Amount Required
Annual	8 Days prior to the Capacity effective date.	72 Days of Capacity charges, commodity charges and VAT.
Monthly	8 Days prior to the Capacity effective date.	1 month of Capacity charges, commodity charges and VAT.
Day-Ahead and Within-Day	FS required prior to the confirmation of the capacity booking.	1 day of Capacity charges, commodity charges and VAT.

108. Will Shippers be required to hold FS with Gas Networks Ireland and National Grid?

Shippers wishing to book Capacity at the Moffat Interconnection Point will be booking a bundled product consisting of National Grid Exit Capacity and Gas Networks Ireland Entry Capacity. In line with the Gas Networks Ireland Code of Operations, Shippers will be required to put financial security in place as described in Question 107 to meet their obligations to Gas Networks Ireland for the Gas Networks Ireland component of the Bundled Product. Similarly, a Shipper will be required to put Financial Security in place with National Grid to meet its obligations with respect to the National Grid Exit Capacity.

109. Are Shippers required to have FS for secondary capacity?

No.

The FS obligation for capacity will remain with the original capacity holder, despite the approval of a secondary trade.

110. Why is the FS policy being reviewed now?

The FS review is taking place now for a number of reasons:

- While this policy review is not a direct requirement of the EU Network Codes, it has come about as a result of indirect effects of the Network Codes. The CAM/PRISMA auction process necessitated a review of the FS arrangements given the long lead times between the time of booking and the time of use of Annual and Quarterly Capacity.
- Due to a gradual move amongst Shippers to use Short Term Products, specifically Daily products and because the current Financial Security Policy does not require a Shipper to have Financial Security in place at the time of booking a daily product it was felt that a review of the financial security policy should be carried out.
- Currently, a Shipper is supposed to put financial security in place after the booking has been approved for daily products but as the review of a Shipper's Financial Security obligation is only carried out on a monthly basis it is possible for a Shipper have up to 31 days of Capacity

bookings without adequate financial security. This is considered to be an unreasonable risk for the Transporter to have to endure therefore a review of the financial security policy was deemed necessary.

111. Can submission of new/amended FS be approved out of hours?

The Transporter currently does not have the facility to approve Financial Security outside of normal business hours. This means that if a Shipper submits Financial Security outside normal business hours, this will not be reflected in GTMS until the next business day.

112. Is FS posted with PRISMA & GNI separately?

No. FS is posted to and held by GNI only.

Financial security for Monthly and Daily capacity products must then be raised on the PRISMA Platform in order for a Shipper to take part in auctions for Monthly and Daily capacity.

113. How will Shippers raise FS on PRISMA?

Though a shipper's financial security status is maintained on GTMS, shippers will be responsible for assigning a portion of this security to the PRISMA platform to allow the shipper to take part in auctions for capacity products at an IP.

To assign financial security to a PRISMA auction the shipper will have to designate through a GTMS screen, the amount of financial security it wishes to assign to the PRISMA platform for use in PRISMA auctions. This financial security will then only be available for use in PRISMA auctions and not for booking capacity at non-IP. The shipper's balance of available financial security on GTMS will be reduced accordingly.

114. Who will determine the split of FS between GTMS and PRISMA?

Shippers will determine this split.

Shippers have the ability to review their financial security status through GTMS and to determine the "excess" security available for future transactions. "Excess" refers to that portion of a shipper's financial security which has not been used as security for a capacity booking, and is therefore available for assigning to PRISMA.

115. Will financial security restrict what each shipper can book at an auction?

For Daily, Within-Day and Day Ahead capacity auctions a shipper will be restricted in the amount of capacity it can book by the amount of financial security it has in place.

116. Can Shippers pre-pay before the Transporter issues invoices to reduce the level of FS that needs to be raised?

No.

The FS Business Rules proposed the use of a new non-interest bearing Deposit Agreement. This Agreement will enable Shippers to add and withdraw funds on an as needed basis, thus providing Shippers with more flexibility to their FS arrangements.

117. Will Shippers receive an alert to highlight that their FS has been reduced beneath a particular level?

Yes.

Shippers will be provided with an early warning system to alert them to the fact that they have utilised 80% of their posted financial security. This will result in a message being sent from GTMS to the Shipper.

When a shipper has used all of its posted financial security it will receive an automatic notification via GTMS and will be given three (3) business days to replenish their security. During this three day period, the shipper will be allowed to continue trading as normal without any requirements for financial security. This two day period will cease at the close of business, defined as 5:00 PM on the second business day.

4. Nominations

4.1. Balancing NC

118. Why is the Nominations process changing?

The Balancing Network Code (Regulation EU 312/2014) and the Interoperability and Data Exchange Network Code both require amendments to the nominations processes at Interconnection Points.

119. What are the main changes to the nominations process?

The principle changes to the nominations process at Interconnection Points are as follows:

- **Submission of Nominations / Renominations** - The deadlines by which nominations and renominations must be submitted by Shippers are harmonised across Europe
- **Processing of Nominations / Renominations** - The manner in which nominations at Interconnection Points are processed and by which parties is harmonised across Europe

120. When will the changes to the nominations process come into effect?

1 October 2015

121. How will nomination / renomination submission windows change?

The principle changes to the nominations process at Interconnection Points are as follows:

	Now	Post 1 October 2015
Nomination window closes	10:00 D-1	13:00 D-1
Renomination Window opens	18:00 D-1	15:00 D-1

Renomination Window closes	01:45 D <i>(4 hrs 15 mins before end of gas day 06:00)</i>	02:00 D <i>(3 hrs before end of gas day 05:00)</i>
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122. The Network Codes require changes to the nominations process at *Interconnection Points*. Are there any changes proposed at *points which are not Interconnection Points*?

Yes.

Although not an explicit requirement of the Network Codes, the nomination and renomination submission windows as specified above will be aligned across **all points on the network**.

123. Will the Moffat Agent continue to process nominations at the Moffat Interconnection Point?

No.

The Moffat Agent will not process nominations at Moffat after gas day 30 September 2015. From 1 October 2015, the two TSOs at the Moffat Interconnection Point will process nominations.

124. The Network Codes require that a ‘single’ nomination be submitted at an Interconnection Point. Does this mean that I cannot engage a counterparty at Moffat as per existing arrangements?

There will be two distinct nomination types possible at an Interconnection Point:

1. ***Single Sided Nomination (SSN)*** - a nomination submitted by a single Shipper, such single nomination constituting an exit nomination from one system and an entry nomination to the adjacent system.
2. ***Double Sided Nomination (DSN)*** - a pair of nominations submitted by two counterparties, one at each side of the Interconnection Point with a matching rule applied by the TSOs. This is similar to the existing system at Moffat and allows counterparties to submit matching nominations.

125. Does GTMS require details of all my counterparties on the National Grid side of the IP when submitting a nomination?

Yes.

When submitting a nomination, a shipper’s counterparty EIC must be registered with GTMS in order that the counterparty can be selected from a drop down menu. There will not be an opportunity on GTMS to manually type in an EIC for a counterparty Shipper.

126. Do I need to hold Capacity in order to submit a nomination?

No, with the exception of Virtual Reverse Flow.

A shipper can nominate without having capacity booked, with the knowledge that this may cause an Overrun if capacity is not subsequently booked. GTMS does not check nominations or CQ’s against Active Capacity until the end of gas Day D. This allows Shippers the time to subsequently book capacity to match their previously submitted nomination.

However, in a situation of extremely high demand, where the TSO cannot meet all nominations submitted, the TSO would first reject a nom from a Shipper who did not have sufficient capacity.

Shippers must hold VRF capacity prior to submitting a VRF nomination.

127. The Moffat Agent will be discontinued from 1 October 2015. Where should I submit my Moffat nominations?

1. **Single Sided Nomination** - nominations will be submitted to Gemini. The nomination will then be processed jointly by the TSOs.
2. **Double Sided Nomination** - The Exit nomination will be submitted on Gemini. The Entry nomination will be submitted on GTMS. The nominations will then be processed jointly by the TSOs.

128. How long after I submit a nomination, will I see the results of the matching on GTMS?

Not later than 2 hours after the end of the hour in which a Shipper has submitted a nomination, Gas Network's Ireland will perform matching and generate CQs. Gas Networks Ireland will inform National Grid and results will be visible on the IP Nom Summary Screen and on in the *NominationsQuery Web Service*.

129. I hold unbundled capacity on both sides of the IP. Is it mandatory to submit a double sided nomination in this instance?

No. There is no direct link between capacity type and nomination type i.e. single sided nominations are not exclusively used in situations where a Shipper holds bundled capacity nor are double sided nominations exclusively used in situations where a Shipper holds unbundled capacity.

The purpose of a double sided nomination is to facilitate a scenario where two *different* parties hold capacity at each side of an IP. In the situation described above, the *same* party holds the capacity on both sides and therefore a single sided nomination will suffice, although it should be noted that it is also possible to submit a double sided nomination in this scenario.

You have two options:

1. Submit a single sided nomination; or
2. Submit a double sided nominations, specifying yourself as the counterparty

DO NOT submit a combination of both - see question 133 below.

130. I hold bundled capacity at the IP. Is it mandatory to submit a single sided nomination in this instance?

No.

There is no direct link between capacity type and nomination type i.e. single sided nominations are not exclusively used in situations where a Shipper holds bundled capacity nor are double sided nominations exclusively used in situations where a Shipper holds unbundled capacity.

You have two options:

1. Submit a single sided nomination; or
2. Submit a double sided nominations, specifying yourself as the counterparty

The purpose of a double sided nomination is to facilitate a scenario where two different parties hold capacity at each side of an IP. While the scenario above involves only one Shipper, it is nonetheless possible to specify identical counterparties. A double sided nomination in this context will be processed in the same way as a single sided nomination save perhaps that a double sided nomination will apply the matching rule and may therefore capture an unintended error.

131. What is the Nomination Cycle?

Nomination Cycle means the 2 hour cycle for processing nominations and confirmation of quantities by the TSO (for flows on Gas Day D, that is 13:00 D-1 to 15:00 D-1, so D-1 nominations have to be submitted by 13:00 on D-1)

Renominations also have a 2 hour cycle, with the cycle starting at the first hour bar following submission of a renomination.

132. Is it possible to submit a combination of single sided and double sided nominations in a given nomination cycle?

Note: Single-sided nominations cannot be submitted on GTMS

The governing principle is that only one Confirmed Quantity (CQ) may be issued per unique 'Shipper pair' in a given nomination cycle. The electronic messaging format used in the nominations process identifies 'unique' nominations by virtue of 'Shipper pairs'. This means that there are two different answers to this question depending on the composition of the double sided nomination:

Scenario 1: two distinct parties involved in the DSN

DSN Shipper Pair = Shipper 1 / Shipper 2
SSN Shipper Pair = Shipper 1 / Shipper 1

Answer: YES - it is possible to submit a DSN and SSN in a single hour / cycle

Why? the SSN and DSN are considered unique nominations (distinct 'pairs') and will be processed separately and independently.

Scenario 2: parties involved in the DSN are identical

DSN Shipper Pair = Shipper 1 / Shipper 1
SSN Shipper Pair = Shipper 1 / Shipper 1

Answer: NO - it is **not** possible to submit a DSN and SSN in a single hour / cycle

Why? the SSN and DSN are **not** considered unique nominations (distinct 'pairs') and both nominations will be rejected by GTMS.

133. What complications arise (if any) from having a mix of bundled and unbundled capacity at an IP from a nominations standpoint?

The nominations process facilitates a Shipper holding a combination of bundled and unbundled capacity. The examples below illustrate the nominations options available to a Shipper in a number of different scenarios depending on whether the Shipper holds bundled capacity, unbundled capacity, or a combination of both:

Scenario 1: Unbundled Capacity both sides of the IP with separate Shippers involved.

Shipper A holds unbundled capacity on one side of an Interconnection Point. Shipper B holds capacity at the other side of the IP. Shipper A and Shipper B have an arrangement whereby they submit separate nominations at each side of the IP which are then subject to matching rules as part of the nominations process.

Bundled or Unbundled? Capacity of:	Unbundled		Bundled
	TSO1	TSO2	TSO1 & TSO2
Shipper A	100	-	-
Shipper B	-	100	-

Options:

Option 1:	Shipper A submits double sided nomination for 100 units, specifying Shipper B as counterparty
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Scenario 2: Unbundled Capacity both sides of the IP with the same Shipper on both sides of the IP.

Shipper A holds unbundled capacity on both sides of an Interconnection Point, but does not hold any bundled capacity at the IP.

Bundled or Unbundled? Capacity of:	Unbundled		Bundled
	TSO1	TSO2	TSO1 & TSO2
Shipper A	100	100	-
Shipper B	-	-	-

Options:

Option 1:	Shipper A submits single sided nomination for 100 units
Option 2:	Shipper A submits double sided nomination for 100 units, specifying itself (Shipper A) as counterparty

<u>DO NOT:</u>	<u>DO NOT</u> submit a combination of single sided and double sided nominations as both will be rejected by GTMS.
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Scenario 3: Unbundled Capacity both sides of the IP in conjunction with bundled capacity with 2 Shippers involved.

Shipper A holds unbundled capacity on one side of an Interconnection Point, and also holds bundled capacity at the IP.

Bundled or Unbundled? Capacity of:	Unbundled		Bundled
	TSO1	TSO2	TSO1 & TSO2
Shipper A	100	-	200
Shipper B	-	100	-

Options:

Option 1:	Shipper A submits: <ul style="list-style-type: none"> • a single sided nomination for 200 units; and • a double sided nomination for 100 units, specifying Shipper B as the counterparty.
Option 2:	Shipper A submits: <ul style="list-style-type: none"> • a double sided nomination for 200 units, specifying itself (Shipper A) as the counterparty; and • a double sided nomination for 100 units, specifying Shipper B as the counterparty.

Scenario 4: Unbundled and bundled capacity on both sides of the IP with one Shipper involved only.

Shipper A holds unbundled capacity on both sides of the Interconnection Point, and also holds bundled capacity at the IP.

Bundled or Unbundled? Capacity of:	Unbundled		Bundled
	TSO1	TSO2	TSO1 & TSO2
Shipper A	100	100	200
Shipper B	-	-	-

Options:

Option 1:	Shipper A submits: <ul style="list-style-type: none"> • a single sided nomination for 300 units
Option 2:	Shipper A submits: <ul style="list-style-type: none"> • a double sided nomination for 300 units, specifying itself (Shipper A) as the counterparty
<u>DO NOT:</u>	<u>DO NOT</u> submit a combination of single sided and double sided nominations as both will be rejected by GTMS.

Scenario 5: Bundled capacity only - no counterparty involved

Shipper A holds bundled capacity at the Interconnection Point, and does not hold any unbundled capacity.

Bundled or Unbundled? Capacity of:	Unbundled		Bundled
	TSO1	TSO2	TSO1 & TSO2
Shipper A	-	-	200
Shipper B	-	-	-

Options:

Option 1:	Shipper A submits: <ul style="list-style-type: none"> • a single sided nomination for 200 units
Option 2:	Shipper A submits: <ul style="list-style-type: none"> • a double sided nomination for 200 units, specifying itself (Shipper A) as the counterparty
<u>DO NOT:</u>	<u>DO NOT</u> submit a combination of single sided and double sided nominations as both will be rejected by GTMS.

134. What is an Operational Balancing Agreement (OBA)?

A Shipper shall, subject to certain limits, receive an Allocation at an Interconnection Point equal to its Confirmed Quantity. In such circumstances, the Transporter and the Adjacent Transporter shall allocate the difference between metered quantities and the aggregate of Confirmed Quantities to an Operational Balancing Account (OBA) operated by the Transporters, whereby any under-delivery or over-delivery in respect of a given Gas Day is addressed by scheduling a corrective under-delivery or over-delivery in respect of the subsequent Gas Day.

135. What determines a shipper's imbalance position?

A shipper's imbalance position is determined by the difference between its aggregate entry allocations and its aggregate exit allocations.

136. When will the OBA account be in place at the Moffat IP?

An OBA will be in place at the Moffat IP from Gas Day Oct 1st onwards. This will result in a new allocation process which aims to keep the Shipper Allocations whole to their CQs.

137. Will GTMS Moffat Agent web services cease from Oct 1st?

All GTMS Moffat Agent submission web services will no longer be available from Oct 1st 2015. Query web services will continue to be made available for a limited period.

138. Will there be any changes made to the existing allocation web services?

"Type of Nomination" and the "Matching Registration" for each allocation will not be available on the web service for the moment although they will be visible on the published Transportation Allocation Statement on GTMS EE.

5. Transitional Arrangements

5.1. Transitional Capacity Arrangements

139. Why are the Transitional Arrangements necessary?

The transitional arrangements are necessary to ensure a stable transition process from the current capacity booking arrangements to those outlined in the Balancing and CAM Network Code.

140. Will Shippers be allowed to align their Exit Annual Capacity bookings at non-IP's as part of the Transitional Arrangements?

Yes. Shippers will be allowed to align Exit Capacity Bookings in the same way as Entry Bookings may be aligned.

141. When is the last date that I can book Annual Capacity on GTMS?

Booking requests in respect of Annual or multi-annual Capacity at Interconnection Points may be submitted on the Transporter's IT System (GTMS) as per the existing Code rules until **05.59 on 23 September 2015**.

142. When is the earliest date that I can book Annual Capacity on PRISMA?

Booking requests on PRISMA for Annual Capacity at Interconnection Points may be submitted at 08:00 hours on the date set by the ENTSOG calendar (currently **02 March 2016**), for Capacity which will become effective from 05:00 hours on 1 October 2016.

143. How do I book Annual Capacity between these two dates?

In order to book annual capacity between these dates Shippers will have to partake in the transitional arrangements as detailed in Code Modification A066 and in question below.

144. I have Capacity that expires between these two dates. What are my options?

Shippers with existing Annual Capacity bookings at Interconnection Points, which have an end date between 1 October 2015 and 1 October 2016 may advise the Transporter which of the following options (a or b) it chooses **between 1 August 2015 and 23 September 2015**:

- a) request a new Annual Capacity booking to be created, specifying:
 - A start date which is one day after the end date of the Shipper's existing Capacity booking;
 - An end date of 30 September 2016; and
 - The amount of Capacity requested, which may not necessarily be equal to the amount of Capacity held in respect of the Shipper's existing booking; or
- b) request that no action be taken in respect of its existing Annual Capacity bookings, thus maintaining its existing level of Capacity bookings.

145. When is that last time I can book Daily Capacity on GTMS?

Currently Daily Capacity may be booked up to 7 days prior to the effective date of the capacity.

The Capacity Booking Window for Daily Capacity will be changed between 24 October 2015 and 31 October 2015, to ensure Shippers can book Daily Capacity on GTMS with an effective date no later than 31 October 2015.

This means that any Daily Capacity booked between these two dates will have a cutoff date of 31 October 2015.

146. When is the first time I can book Daily Capacity on PRISMA?

The first CAM auction for Daily Capacity will take place on 31 October 2015 with a first effective date of 1 November 2015.

5.2. Voluntary Bundling

147. What is Voluntary Bundling?

Regulation EU 984/2013 states that "All capacity shall be bundled at the earliest opportunity"

In order to accommodate this the Transporter has established a process whereby Shippers who have capacity contracts in place that do not expire until after the Regulation comes into effect may apply to bundle this capacity with capacity at the other side of the IP, so long as this capacity is owned by the same Shipper, i.e. a single EIC is required.

148. What happens if I decide not to bundle my capacity?

According to the Regulation:

‘Existing transport contracts for unbundled capacity cannot be renewed, prolonged or rolled over after their expiration date. Such capacity shall become available capacity as of the expiration date of the transport contracts’ (Art. 20 (5)).

In other words, a Shipper may choose not to bundle their contracted capacity and leave the capacity expire. However all legacy unbundled Annual or Multi-Annual Capacity booked with the Transporter will be reduced to zero on the 1st October 2023.

149. Are there any penalties for not bundling capacity?

No.

There are no penalties or fines imposed upon Shippers who do not bundle their capacity. However as stated in Q. 148 it should be noted that all legacy unbundled capacity will be reduced to zero on 1 October 2023.

150. How soon can I bundle my capacity?

Bundling Requests may be submitted from 1 August 2015 but no later than 60 days prior to the start date of the requested bundling period.

151. Who do I submit my bundling request to?

A bundling request may be submitted to either the Transporter, or the Adjacent Transporter and the request will be jointly processed.

A Shipper should submit the request to one Transporter only.

152. How do I submit a bundling request to the Transporter?

A bundling request shall be submitted to the Transporter:

- via an email (using a standardised form) to the Shipper’s Key Account Manager (KAM);
and
- by bulletin on the GTMS transportation system.

153. How long does it take to process a bundling request?

A Shipper will receive notification by email of the acceptance or rejection of its bundling request no later than 5 Business Days prior to the effective date of the bundling request.

5.3. Moffat Agent Transition

154. Will the Moffat Agent continue to match Nominations on behalf of Shippers?

No.

The Moffat Agency is due to end its role from Gas Day 30/09/15. As a contingency in the event of the new rules not going live the Agent may seek to renew the term this summer. A possible 3 or 6 month term are under consideration by GNI.

155. Will other Agents be facilitated at non-IP Entry Points?

Yes.

GNI may continue to designate Agents as required.

156. Who will match Nominations in the absence of the Moffat Agent?

This will be carried out by the **Matching Transporter**, whose role it is to:

- a) receive Double Sided Nominations from Shippers;
- b) receive forwarded Single Sided Nominations / Renominations from the Initiating Transporter;
- c) determine its Processed Quantity;
- d) receive the Initiating Transporter's Processed Quantity;
- e) perform the matching process to determine the Confirmed Quantity;
- f) forward the Confirmed Quantity to the Initiating Transporter and the Shipper.

157. What happens to Shipper's existing web services that currently message the Moffatt agency module?

The Moffat GTMS module will cease to be used from 30 September 2015. All existing matching registrations will be configured to end-date on 30 September 2015. In the event of the Agency extending beyond 30 September 2015, note that no IT changes are being made to the Moffat GTMS module.

158. Will I be able to log-in to the Moffat GTMS module after 1st October 2015?

Yes, for historic reports.

6. Typical Day – Auctions

		Gas Day D-1																			
<u>Product/Event</u>	0800	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800	1900	2000	2100	2200	2300	0000	0100	0200	0300	0400
Auction																					
Annual, Quarterly, Monthly																					
Day Ahead																					
Within Day																					
Secondary Capacity (IPs)																					
Non-IP Bookings (GTMS)	from D-7																				
NDM Forecasts	0830																				

		Gas Day D																			
<u>Product/Event</u>	0500	0600	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	→	2000	→	2300	0000	0100	0200	0300	0400
Auction																					
Annual, Quarterly, Monthly																					
Daily																					
Within Day																					
Secondary Capacity (IPs)																					
Non-IP Bookings (GTMS)																					
NDM Forecasts				0830							1530			2030		2330					

7. Typical Day – Nominations

	Gas Day D-1																				
Product/Event	0800	0900	1000	1100	1200	1300	1400	1500	1600	1700	1800	1900	2000	2100	2200	2300	0000	0100	0200	0300	0400
Nominations																					
Nomination Period	D-31 to 13.00 D																				
Renomination Period								opens at 15:00													
NDM Forecasts	0830																				

	Gas Day D																				
Product/Event	0500	0600	0700	0800	0900	1000	1100	1200	1300	1400	1500	1600	→	2000	→	2300	0000	0100	0200	0300	0400
Nominations																					
Nomination Window																					
Renomination Window	close at 02:00																				
NDM Forecasts				0830							1530			2030		2330					