

Answers to questions and comments received during public consultations on Kiemenai interconnection agreement amendments (02.01.2025-19.01.2025)

Nr.	Related paragraph from agreement	Question/ Comment	Question/ Comment author	Response
1	6.1. The purpose of the matching process is to have identical confirmed quantities for each of network users at both sides of Kiemenai IP when processed quantities are not aligned.	Would this make it more difficult to know which side there is a potential problem for example curtailment or mismatch?	Equinor ASA	The information exchange between TSOs and between TSOs and NUs is governed by Commission Regulation (EU) 2015/703 of 30 April 2015, establishing a network code on interoperability and data exchange rules (INT NC), as well as the description of Edigas messages. NUs can review the response message on the user portal. If additional information is required, the TSO can provide it upon request.
2	6.2. The matching rule shall be a lesser rule unless TSOs have agreed to implement other matching rule.	This seems practical but how would shippers be able to tell?	Equinor ASA	Currently, TSOs apply the lesser rule in the matching process, with no plans for changes. This principle is also established in the Network Rules, and any potential changes would be subject to market consultation.
3	6.3. Initiating TSO shall be Amber Grid and matching TSO shall be Conexus Baltic Grid.	Is it the matching TSO that determines what is confirmed? For example initiating TSO Amber Grid nominated value 0 Matching TSO Conexus 100 nominated value Scheduled Value 100	Equinor ASA	Since the lesser rule is applied, if one of the TSOs sends a final confirmed value of 0, the final confirmed value will also be 0.
4	6.7. Detailed description of the nominations and re-nominations matching process as well as the division of responsibilities and timeframes is described in Annex 3.	Unfortunately, we have not received the current version of interconnection agreement together with all its Annexes in order to better understand the scope of the changes (you can find our request below). As a result of this we cannot comment paragraphs like this: 6.7. Detailed description of the nominations and re-nominations matching	Eesti Energia AS	Annex 3 and other points don't include any information related to network users. Therefore consultation has been made only for mandatory consultation scope defined by Article 4.2 of INT NC.

		process as well as the division of responsibilities and timeframes is described in Annex 3. as we are missing the content of Annex 3.		
5	<p>6.12. Calculating and sending of processed quantities of gas by the initiating TSO: within 45 (forty-five) minutes.</p> <p>6.13. Calculating and sending of confirmed quantities of gas by the matching TSO: within 90 (ninety) minutes.</p> <p>6.14. Sending confirmed quantities of gas to network users and scheduling the gas flow across the Kiemenai IP: within 2 hours.</p>	<p>We recommend reconsidering the time limits outlined in paragraphs 6.12–6.14. Such long-time delays negatively affect the liquidity on the common gas exchange. We strongly advise to reconsider them and agree on the shortest time limits possible. It cannot take two hours from TSOs to compare and confirm two sets of numerical data. It should be technically possible to perform the matching within couple of minutes so confirmed quantities could be delivered way faster. That would increase the readiness of traders to trade between the countries that will lead to more harmonised price levels between the countries that should lower the price of gas for end customers.</p>	Eesti Energia AS	<p>The duration of each step in the matching process is determined by INT NC and must be applied at every interconnection point within the EU. Ensuring that nominations are confirmed simultaneously at all IPs is crucial for seamless operations.</p>
6	<p>9.1. The TSOs shall ensure the consistency between the allocated quantities at both sides of Kiemenai IP:</p> <p>9.2. gas quantity allocated to network user for a specific day shall be equal to the gas quantity according to nominations confirmed by the TSOs for the network user.</p>	Does this interfere with 2 hour lead time.	Equinor ASA	Clarification of the question is needed for ensuring most accurate and relevant answer,
7	9.4. The TSOs shall endeavor to maintain OBA balance that is as close to zero as possible during the agreed period and depending on operational regimes agreed by TSOs and taking into account the provisions of point 3.7.3.	How do shippers withdraw/inject into OBA? How do we see status of our OBA?	Equinor ASA	As described in INT NC, OBA (Operational Balancing Account) applies only to TSOs and does not affect the quantities confirmed to NUs. OBA is an account between adjacent transmission system operators used to manage steering differences at an interconnection point. The 'allocated as nominated' principle is applied at Kiemenai IP.
8	10.1. TSOs shall ensure that communication procedures, which facilitate fast and simultaneous	We would like the opportunity to put in place Business continuity	Equinor ASA	Thank you for your proposal. However, Conexus and Amber Grid maintain standardized communication

	communication in cases of exceptional events, are in place.	plans with both Amber Grid and Conexus.		procedures with all network users. At this time, establishing special communication arrangements with selected clients is not being considered.
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