

Dear Ladies and Gentleman,

please find our response to the public consultation regarding the creation of a joint GRTgaz-TIGF marketplace as of 1 April 2015 below:

Question 1: Do you have any comments on the management rules proposed by the TSOs for the joint GRTgaz and TIGF PEG?

No, as they are identical to those at the North PEG.

Question 2: Are you in favour of an implementation of Option 1 proposed by the TSO's for the creation of the joint GRTgaz South and TIGF PEG?

Yes, as it is closer to the current situation and to the procedures in the North Zone.

But the scheduling imbalance should only be applied if the mistake is on the shipper's side. There should not be a charge of imbalances for UIOLI or UBI.

WINGAS GmbH is, like the CRE, of the opinion that the limitations on re-nominations are too restrictive especially concerning the wish to optimize nominations and consumption points as well as the prospect of minimizing the imbalances.

Question 3: Are you in favour of the implementation of Option 2 proposed by the TSO's for the creation of the joint GRTgaz South and TIGF PEG?

No, as it too far from the current system. Shipper's nominations aren't taken into account but the TSO's own calculation which would be invisible for the shippers. Furthermore it discriminates shippers who do not have or intend to have any customers in the TIGF zone, especially with the use of a normative key (50/50).

Question 4: Are you in favour of the CRE's proposal concerning an allocation key specific to each shipper to distribute daily imbalances between the two consumer zones in Option 2? If you do not agree, do you have any other suggestions?

If the option is chosen, then yes this key is far more equitable than the use of a normative key (50/50).

Question 5: Do you consider that it would be useful to ask shippers to make nominations at notional consumption points in the Option 2?

No. If the TSO's use their own consumption analysis it is an unnecessary time-consuming process for the shippers. On the contrary: the TSO's should send their estimated consumption to the shippers so that they can comprehend the TSO's balancing.

Question 6: Are you in favour of CRE's proposal concerning capacity restriction management at the interface between GRTgaz South and TIGF zones? If you do not agree, do you have any other suggestions?

As it is not clear what the capacity restriction management will look like it is impossible to say in whose favour one should be. But from our perspective it is not fair towards shippers who are only active in one zone by putting restrictions on other exit points.

If you have any further questions please don't hesitate to contact me.

With kind regards,

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