**The summary of proposals and comments received within the process of Public Consultation on the Amendments to the Common Regulations for the Use of Natural Gas Transmission System (carried out from 16.02.2023 till 22.02.2023)**

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| **No.** | **Relevant regulation norm or initial proposal for the amendments** | **Comment or proposal**  | **The opinion of TSOs regarding the comments or proposals** |
|  | *n/a* | We kindly ask for an explanation for the case where there is congestion at the Kiemenai entry/exit point, and the natural gas quantity nominated to a transmission system user does not match the booked yearly/quarterly/monthly/day-ahead or intra-day capacity. At which moment does the transmission system operator divert the unused capacities to the free market as an interruptible transmission capacity product, and does the transmission system user remain eligible for re-nomination in respect of the unused capacity under the transmission system regulations? | Under TSOs amendment proposal, rights of transmission system users’ bookings of firm capacity products remain unchanged. Interruptible capacity is offered as additional capacity, not as “diverted”. Interruptible capacity will be offered and can be booked from beginning of gas day D-1, as stated in sub-paragraph 4.7.51.1.(e) of proposed amendments. Transmission system user, who has booked firm capacity, shall keep the right to re-nominate unused booked capacity. |
|  | *n/a* | We also ask for an explanation of the settlement obligation (for the initial owner of capacities) and procedure in respect of the transmission capacities booked but not used if those have been diverted to the free market as a day-ahead or intra-day interruptible capacity product. | As the TSOs proposed amendment of offering the interruptible capacity does not in any way affect already booked firm capacity owners’ rights, the settlement obligation for firm booked capacity remains also unchanged. |
|  | “6.1 A network user who has booked the firm capacity products may agree with another network user and transfer right to use the firm capacity product or part of it. Secondary capacity trading shall be restricted to transfer of rights to use capacity of an entry/exit point for a specific time period. Obligations arising from the booked capacity product, including, but not limited to, obligation to pay the TSO for the booked capacity product, shall not be transferred and shall maintain with the network user intending to transfer the booked capacity product. A network user by transferring right to use the capacity product or part of it loses its right to surrender the transferred capacity.” | We also ask for an explanation of the phrase “to surrender the transferred capacity” in the addition made to Article 6.1 of the draft Amendments – “A network user by transferring right to use the capacity product or part of it loses its right to surrender the transferred capacity”. | Capacity surrendering process is described in sub-paragraph 5.3. of the Common Regulations for the Use of Natural Gas Transmission System. The TSOs proposed amendment is clarification to avoid possible capacity surrender applications from the initial capacity owner. If capacity is traded on the secondary market and the rights to use the capacity has been transferred, the capacity cannot be surrendered any more. |
|  | “4.7.5 Short-term capacity product allocation using FCFS principle4.7.5.1 The network user shall submit short-term capacity booking applications within the following periods:d) for the within-day standard capacity product not earlier than confirmation deadline of nomination 15:00 UTC (or 14:00 UTC if daylight saving is applicable) and not later than three hours before the end of gas day;” | Lastly, we suggest specifying the nomination period in Item d) of Article 4.7.5.1 of the draft Amendments by supplementing it with the phrase “on gas day D-1” and wording it as follows:“d) for the within-day standard capacity product not earlier than confirmation deadline of nomination from 15:00 UTC **on gas day D-1** (or 14:00 UTC if daylight saving is applicable) and not later than three hours before the end of gas day”. | Taken into account. |