

# **Implementation progress of the EASEE-gas Common Business Practices 2012 Review**

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## I. Introduction

The European Association for the Streamlining of Energy Exchange-gas, or EASEE-gas, was established on March 14<sup>th</sup>, 2002. EASEE-gas's aim is to create an efficient and effective European gas market by simplifying and streamlining business processes between the stakeholders. EASEE-gas provides a structured platform where all market participants can discuss the harmonisation and simplification of business processes by creating Common Business Practices (CBPs). CBPs are supposed to represent areas of best practice across the European gas market and are not indications about the degree of liberalisation in the various countries.

At the time of the survey in 2012, EASEE-gas had approved and issued 14 CBPs, which are available on the EASEE-gas website, [www.easee-gas.eu](http://www.easee-gas.eu). A full list of all surveyed CBPs is available in the annexes to this report.

EASEE-gas, in consultation with the Madrid Forum participants, has taken responsibility for monitoring the implementation of these CBPs. In May and June 2012 EASEE-gas carried out the fifth survey of CBP implementation to review the progress of implementation of all 14 agreed CBPs and to identify any potential barriers to implementation. All members of EASEE-gas received the questionnaire. A copy of the questionnaire is available on [www.easee-gas.eu](http://www.easee-gas.eu) along with the results of the previous four surveys.

## II. Summary

The survey has provided some valuable insight into the stakeholders' adoption of the existing CBPs. The report was compiled based on the results received, identification of any future actions as a consequence of the survey are part of a separate EASEE-gas initiative. The main points identified in the responses were:

- 65 responses from 15 different European Countries with representation from all active EASEE-gas segments.
- Continued progress in implementation of EASEE-gas CBPs has been seen from the survey.
- The CBPs on Harmonisation of Units, Nomination and Matching Process, Interconnection Agreements and Constraints have been widely implemented across Europe. There are still challenges facing implementation of the CBP Gas Quality Harmonisation. The EASEE-gas Gas Quality Harmonisation Working Group is following up on this issue and is participating in discussions in CEN, the European Committee for Standardisation, on a common gas quality standard. There is a mixed response on the use of Energy Identifier Codes.
- A number of comments received indicated that changes are currently being implemented and that it would be beneficial to carry out a survey again in the near future to monitor CBP implementation.

## III. Observations from the questionnaire

### Responses per segment

The questionnaire was sent to EASEE-gas' 93 Full Members and 30 Associate Members, with responses received from 21 Full Members. These responses covered all of the major EASEE-gas segments apart from the End Users and Retail Suppliers segments.

Transporters were the largest segment to respond with 11 replies, followed by Traders & Shippers and LNG Terminal Storage Operators & Service Providers.

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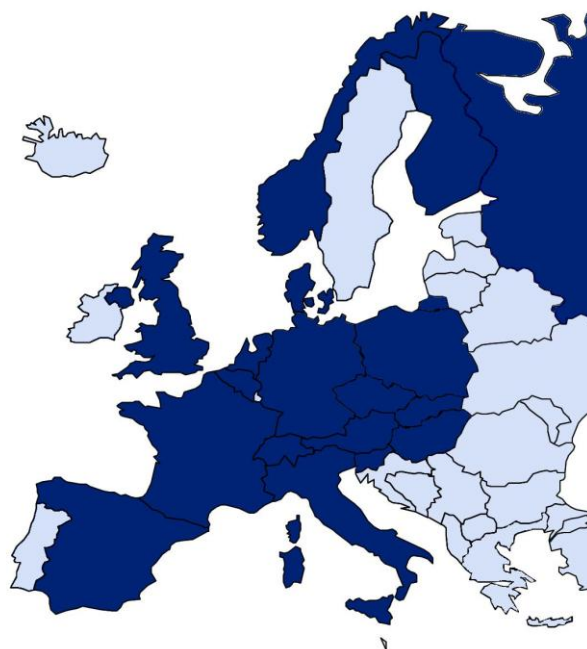
Several members have submitted observations for multiple countries of operation. As such, the numbers of responses counted per question are higher than the number of members participating in the survey.

### Responses geographically

A total of 18 European countries were covered, with several respondents providing multiple responses covering multiple markets, shown in Figure 1. EASEE-gas has maintained the response rate seen in the last survey from Central and Eastern European countries.

#### Countries covered by responses in this and previous surveys

<b>Responses</b>	2005	2007	2010	2012
Austria	1	1	6	4
Belgium	9	7	10	9
Czech Republic	0	0	1	2
Denmark	1	2	2	2
Finland	0	1	1	1
France	6	6	10	7
Germany	8	8	10	9
Greece	0	0	1	0
Hungary	0	0	1	2
Ireland	1	1	1	0
Italy	3	2	4	4
Luxembourg	1	1	1	0
Netherlands	8	6	5	7
Norway	4	1	1	2
Poland	0	0	1	2
Portugal	0	1	1	0
Russia	0	0	0	1
Slovakia	0	0	5	3
Slovenia	0	0	2	1
Spain	1	1	5	2
Sweden	0	1	1	0
Switzerland	0	1	1	3
United Kingdom	9	8	5	4
	52	48	75	65



## IV. Overview of progress per CBP

For each element of each CBP that has been approved, the questionnaire identified the expected implementation date and a number of key milestones required for full implementation of the CBPs. Several CBPs have been merged into one survey due to the close relation of issues addressed therein. Respondents stated whether the CBP had been implemented in the country it was reporting on and if not, when it was likely to be implemented and what were the main barriers to implementation. The legend indicating the level of completion per milestone is given below. It should be remarked that any extreme outliers in the survey have been ruled out from the data evaluation. This entails that any deviation from positive or negative answers representing at least 80% or more of the total number of respondents is excluded ( $N \geq 5$ ).



### 1. CBP 2003-001/01 Harmonisation of Units

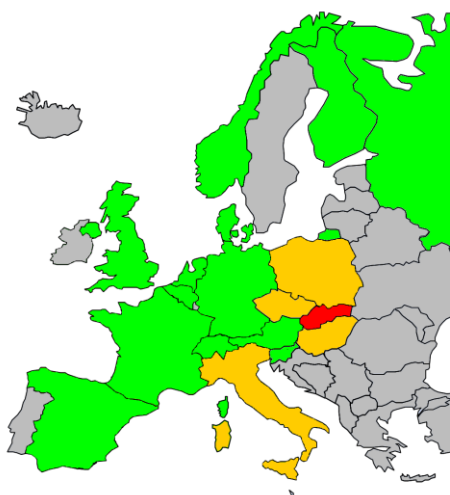
*This Common Business Practice promotes the use of the same units for pressure, energy, volume and calorific value by all organisations involved in the delivery of gas from the producer to the client. For the CBP on Harmonisation of Units the implementation date was 1st October 2005. There were four elements relating to Pressure, Volume, Energy and Gross Calorific Value.*

#### 5.1 General Comments on CBP 2003-001/01

One respondent noted that in operations these units are used but in allocation there is a difference for the temperature (25°C and 15°C). It was identified that this does not cause an operational issue.

One respondent noted that for the time being they use as maximum wobbe of 54,0 MJ/m<sup>3</sup> (15,0 kWh/m<sup>3</sup>) and not 15,8 kWh/m<sup>3</sup> (56,9 MJ/m<sup>3</sup>).

#### 5.2 Pressure: bar



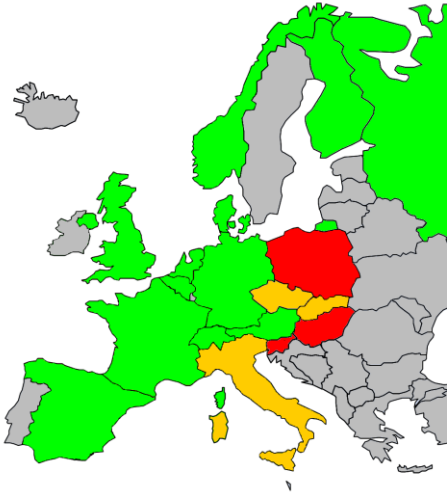
Most respondents (59 out of 65) indicated they are using bar to measure pressure. Other respondents from Poland and the Czech Republic

<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	4	0
Belgium	9	0
Czech Republic	1	1
Denmark	2	0
Finland	1	0
France	7	0
Germany	9	0
Hungary	1	1
Italy	3	1
Netherlands	7	0
Norway	2	0
Poland	1	1
Russia	1	0
Slovakia	0	3
Slovenia	1	0
Spain	2	0
Switzerland	3	0
United Kingdom	4	0

indicated they use Pascal (Pa) to measure pressure.

Regulatory change is required in Poland, Slovakia and Czech Republic to make progress and there are also restrictions in Slovakia due to internal and external operation procedures as well as TSO to other IO contracts.

### 5.3 Energy: kWh (with a combustion reference temperature of 25°C)



<b>Responses</b>	Milestone implemented	Milestone not implemented
Austria	3	0
Belgium	9	0
Czech Republic	1	1
Denmark	2	0
Finland	1	0
France	7	0
Germany	8	0
Hungary	0	1
Italy	1	2
Netherlands	7	0
Norway	2	0
Poland	0	2
Russia	1	0
Slovakia	1	2
Slovenia	0	1
Spain	2	0
Switzerland	3	0
United Kingdom	4	0

Most respondents (53 out of 61) indicated that they are using kWh as the energy unit. Progression towards the milestone was reported in Slovakia and Italy. One respondent from Poland noted that this milestone is expected to be completed by January 2013.

To meet the target in Slovakia legislation must be changed and investment into measurement system made, while existing internal and external procedures are barriers as are existing contracts. However one response stated that a date for the transition has been set.

In Poland the MJ is used instead and barriers to implementing the CBP include existing legislation.

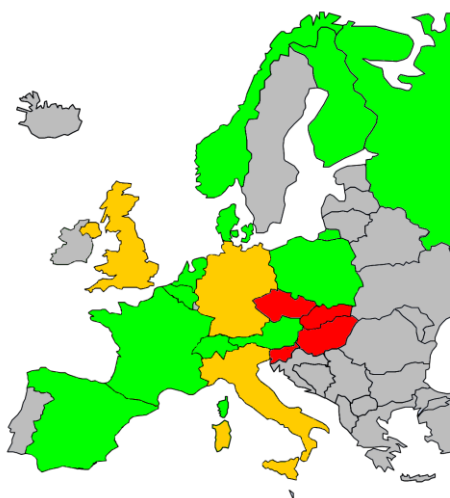
In Czech Republic, a reference temperature of 15°C is used instead of 25°C.

It was noted that in Spain the CBP for Harmonisation of Units has been implemented except for the combustion reference temperature which is still 0°C. However, at border points with other European countries (where CBPs are applicable) this difference is taken into account and appropriate corrections are made in order not to jeopardize users.

One respondent noted that units used in Italy for energy (kJ/MJ/GJ) and for volume (Scm) differ from those of the CBP. Due to implementation of EU Directive 715/2009 business information (nominations and actual volumes) are currently published on the internet with unit of measure compliant to that Directive, where applicable (kWh). The new gas management system (currently at early stages of planning) will allow nominations also in kWh.



#### 5.4 Volume: m<sup>3</sup> (at 0°C and 1.01325 bar) (normal m<sup>3</sup>)



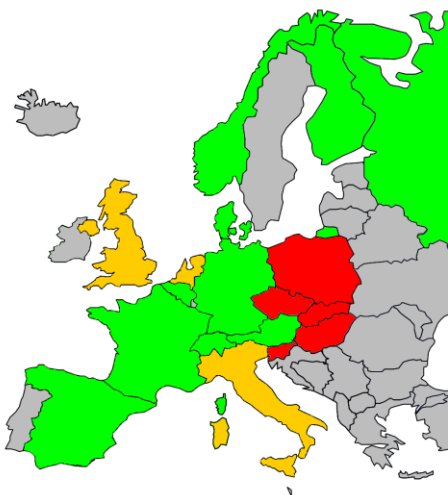
<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	3	0
Belgium	8	1
Czech Republic	0	2
Denmark	2	0
Finland	1	0
France	7	0
Germany	6	2
Hungary	0	2
Italy	1	3
Netherlands	6	1
Norway	2	0
Poland	2	0
Russia	1	0
Slovakia	0	3
Slovenia	0	1
Spain	2	0
Switzerland	3	0
United Kingdom	3	1

Most respondents (47 out of 63) indicated that they are using normal m<sup>3</sup> to measure volume. The target was noted as not relevant to three companies who replied (Czech Republic, Hungary, Slovakia).

A change in legislation is required to change the situation in Slovakia and Hungary. In addition to these, transport contracts as well as internal operating procedures were mentioned as barriers in Italy and Slovakia.

In Czech Republic a combustion temperature of 15°C is used instead of 25°C, whereas a reference temperature of 20°C is used in Slovakia.

## 5.5 Gross Calorific Value: kWh/m<sup>3</sup> (normal m<sup>3</sup>) (with a combustion reference temperature of 25°C)



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	3	0
Belgium	9	1
Czech Republic	0	2
Denmark	2	0
Finland	1	0
France	7	0
Germany	7	1
Hungary	0	2
Italy	1	2
Netherlands	4	3
Norway	2	0
Poland	0	2
Russia	1	0
Slovakia	0	3
Slovenia	0	1
Spain	2	0
Switzerland	3	0
United Kingdom	3	1

Most respondents (45 out of 62) indicated that they are using the harmonized Gross Calorific Value. Members in Italy reported that there is progress towards meeting this milestone. Five Members reported that this milestone was not relevant to their company (Slovakia, Poland, Hungary, Czech Republic and Italy).

Respondents in Netherlands said that legislation/regulation is a prime barrier and that existing contracts use units of GCV (kWh/m<sup>3</sup>). Allocations are expressed however in kWh (25°C). One respondent reported that MJ/m<sup>3</sup> is used instead of KWH/m<sup>3</sup> in Netherlands and Poland.

In Czech Republic a combustion temperature of 15°C is used instead of 25°C, whereas a reference temperature of 20°C is used in Slovakia.

Existing transport contracts were reported as obstacles to implementation in Poland, Slovakia and a change in legislation is required in Hungary. Existing transport agreements were reported as a barrier in Italy.

## 2. CBP 2003-002/02 Harmonisation of Nomination and Matching Process

*This Common Business Practice describes a first set of recommendations for the part of the process which relates specifically to cross-border transportation nominations and involves shippers and TSOs. For reasons of consistency, it should also serve as the core for the communication processes between all other relevant parties involved in the gas chain. Implementation Date: 1st April 2009*

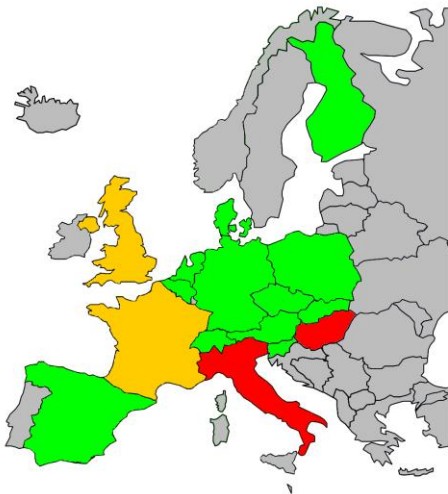
### 2.1 General comments on CBP 2003-002/02

One respondent noted that they did not provide feedback because the CBP needs to be adjusted in line with the new ENTSO network code. In addition, it was noted that e.g. UTC is used partly in the nomination procedures, and only where EDIG@S is used which is not always the case or is only one of several possibilities.

One respondent noted that the TSO in Poland changed the gas day on 1st of July from 10pm-10pm to 6am-6am and introduced EDIG@S in January. For this reason it would be important to re-evaluate the situation at the end of 2012.

Similarly, one respondent noted that operational changes will be made to the Entry/Exit model in Austria starting 01/01/2013 and a further evaluation should be made mid-2013.

### 2.2 The time reference used in the nomination scheme is "Coordinated Universal Time" as defined by the International Radio Consultative Committee



<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	3	0
Belgium	7	0
Czech Republic	1	0
Denmark	1	0
Finland	1	0
France	4	1
Germany	6	0
Hungary	0	1
Italy	0	2
Netherlands	6	0
Poland	2	0
Slovakia	2	0
Slovenia	1	0
Spain	1	0
Switzerland	1	0
United Kingdom	1	2

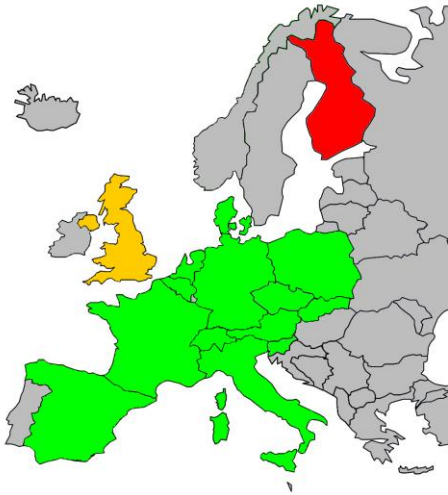
Most respondents (33 out of 39) indicated that this milestone is implemented.

Two members mentioned the milestone as not relevant to their company (France, Slovenia).

Barriers in the UK consist of existing sales and purchase arrangements and existing internal operating procedures.

Barriers in France and Italy are caused by existing TSO to TSO contracts.

## 2.3 Handling mismatches - Lesser Rule principle applied to matching of nominations



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	2	0
Belgium	7	0
Czech Republic	2	0
Denmark	1	0
Finland	0	1
France	5	0
Germany	5	0
Italy	1	0
Netherlands	6	0
Poland	1	0
Slovakia	3	0
Slovenia	1	0
Spain	1	0
Switzerland	1	0
United Kingdom	2	1

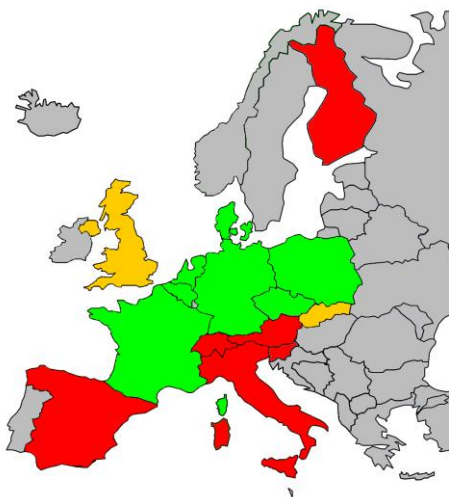
Most respondents (38 out of 40) indicated that this milestone is implemented.

Two respondents noted that this milestone was not relevant to their company (Finland and UK).

Barriers to implementation in Finland include existing sales and purchase contracts and transport contracts. In addition, a change in legislation is required and a restructuring of the gas market to allow for third party access.

## 2.4 Initial Nomination Scheme Deadlines for Gas Day D-1 exist for:

- First Shipper Deadline = 13:00 UTC, (12:00 UTC in Summer-time)
- First TSO Deadline: 14:00 UTC, (13:00 UTC in Summer-time)
- Second Shipper Deadline = 15:00 UTC (14:00 UTC in Summer-time)
- Second TSO Deadline= 17:00 UTC, (16:00 UTC in Summer-time)



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	0	2
Belgium	7	0
Czech Republic	2	0
Denmark	1	0
Finland	0	1
France	4	0
Germany	5	0
Italy	0	1
Netherlands	5	1
Poland	1	0
Slovakia	1	2
Slovenia	0	1
Spain	0	1
Switzerland	0	1
United Kingdom	2	1

28 out of the 39 respondents indicated that this milestone is implemented.

Progress towards this target was noted for Slovakia, Switzerland and Italy, with the milestone due to be completed in Austria in 2013.

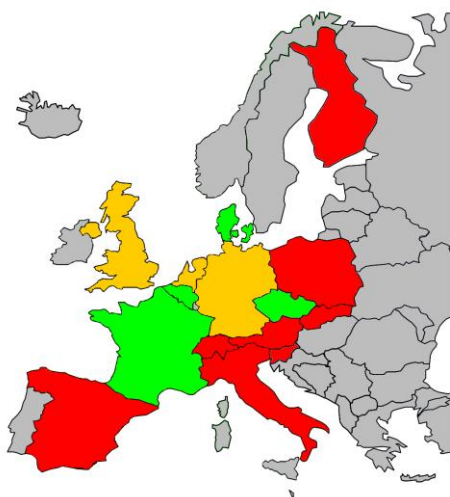
Regulatory and legislative barriers exist in Spain and Slovakia. Barriers in Austria include existing contract network codes and TSO to TSO contracts where a regulatory change is also required.

In Slovakia it was clarified that only the first shipper and 2<sup>nd</sup> TSO deadlines are used.

In Switzerland, TSO to TSO contracts are a barrier and shifting the time in Interconnection Agreement (Network Code Italy) is needed to meet the milestone.

## 2.5 Renominations before Gas Day D-1 exist for:

- Third Shipper Deadline= 19:00 UTC (18:00 UTC in Summer-time)
- Third TSO Deadline= 21:00 UTC, (20:00 UTC in Summer-time)
- Fourth Shipper Deadline= 23:00 UTC, (22:00 UTC in Summer-time)
- Fourth TSO Deadline= 01:00 UTC, (00:00 UTC in Summer-time)



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	0	2
Belgium	6	1
Czech Republic	1	0
Denmark	1	0
Finland	0	1
France	4	0
Germany	3	2
Italy	0	1
Netherlands	3	3
Poland	0	1
Slovakia	0	2
Slovenia	0	1
Spain	0	1
Switzerland	0	1
United Kingdom	1	2

19 out of the 37 respondents indicated that this milestone is implemented.

Two respondents indicated that the milestone was not relevant to their company (Slovenia, Austria).

Progress towards a target date was reported in Slovakia and Italy.

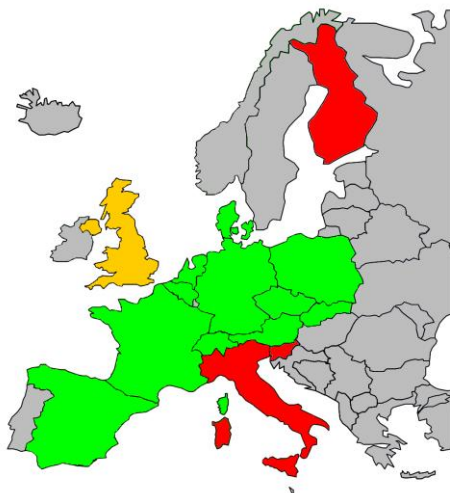
A respondent from Finland noted that reform is necessary in the gas market before this milestone can be reached.

External operational procedures were noted as a barrier in Slovenia. In Poland, Slovakia and Austria, network code transport contracts are a barrier as they do not allow for renomination deadlines, requiring regulatory changes. TSO to TSO contracts are an additional barrier in Austria. TSO to TSO contracts are a barrier in Switzerland which can only be changed with a change to the network code in Italy.

External operational procedures were mentioned as a barrier in Belgium, Netherlands, Germany and UK.

In Spain, a change to the NGTS (existing Spanish rules for the technical management of gas system approved by law) is required to implement the milestone.

**2.6 Message Content: All notices from the shippers shall include information with regard to the receiving or delivering shippers in the adjacent transmission system.**



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	2	0
Belgium	7	0
Czech Republic	2	0
Denmark	1	0
Finland	0	1
France	5	0
Germany	5	0
Italy	0	1
Netherlands	5	1
Poland	1	0
Slovakia	3	0
Slovenia	0	1
Spain	1	0
Switzerland	1	0
United Kingdom	1	2

Most respondents (34 out of 40) indicated that this milestone is implemented.

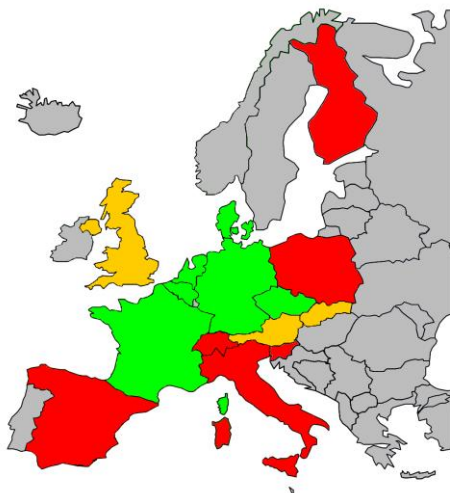
Italy reported progress towards a target date.

One respondent (Slovenia) reported the milestone not relevant for their company.

Finland again reported that reform is necessary in the gas market before this milestone can be reached.

## 2.7 Re-nominations TSOs

As from two (2) hours before the start of Gas Day D until three (3) hours before the end of Gas Day D, TSOs will allow for a continuous re-nomination process, taking into account a two (2) full hour lead time as from the hour bar. At the end of this period, TSOs will issue a confirmation notice to confirm the rescheduled quantities of gas for Gas Day D.



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	1	1
Belgium	7	0
Czech Republic	2	0
Denmark	1	0
Finland	0	1
France	5	0
Germany	5	0
Italy	0	1
Netherlands	6	0
Poland	0	1
Slovakia	2	1
Slovenia	0	1
Spain	0	1
Switzerland	0	1
United Kingdom	2	1

Most respondents (31 out of 40) indicated that this milestone is implemented.

Progress towards the milestone was reported for Italy and Slovakia. The milestone is expected to be met in 2013 in Austria.

This milestone is not relevant for one respondent (Slovenia).

Finland again reported that reform is necessary in the gas market before this milestone can be reached.

A change of legislation and regulation is required in Slovakia. However it was noted that the operational possibilities of SSO have to be respected which also acts as a current barrier.

External operating procedures are a barrier in Slovenia. The transport network code is a barrier in Poland because it does not contain renomination deadlines and regulation needs changing. Austria experiences a similar problem but at HUB operations this milestone is possible.

Internal operating procedures are a barrier to implementation in UK.

In Spain, a change in legislation is required to meet this milestone.

Existing TSO to TSO contracts are a barrier in Switzerland requiring changes to the network code in Italy.



### 3. CBP 2005-001/02 Harmonisation of Natural Gas Quality

*This CBP recommends natural gas quality specifications to streamline interoperability at cross border points in Europe and describes the recommended gas quality parameters, parameter ranges and the implementation plan.*

*Target date for implementation is 1 October 2006.*

#### 3.1 General Comments on CBP 2005-001/02

One respondent made the following comment with respect to this CBP:

- 1) Normally only H<sub>2</sub>S is measured of the S-components but spot checks have shown this to be the dominant one for gas exported from Norwegian Continent Shelf (NCS).*
- 2) NCS gases have the same content specifications as CBP and more stringent water DP and HC DP than CBP.*
- 3) As for O<sub>2</sub> this is only measured online if the customer demands it. Spot checks are most often done. Since bio-gas is not presents in NCS gas the O<sub>2</sub> amounts are generally negligible (below detection limits).*

Another respondent noted that odorization is not in the scope of the CBP, but it is a hurdle to reversing the flows between France and adjacent countries. In Spain the existing rules provides a wider natural gas quality specification for almost all parameters. Now the Spanish gas sector is promoting enlarging existing specification provided by CBP up to the Spanish standard in order to grant as much as possible new and existing gas supply sources to enter into the European gas systems.

Another respondent noted that quality specification and limits vary from country to country and partly within a country at TSO or distribution level.

One respondent noted that the Italian standardisation body (CIG) is participating to the working groups on gas quality specifications at European level (CEN) and that they are participating to the works on the same subject (gas quality harmonization) within Easee-Gas Gas Quality Harmonization Working Group

### 3.2 Recommended Gas Quality Parameters

This milestone recommends the following gas quality parameters:

S - Total Sulphur (max 30 mg/m<sup>3</sup>)

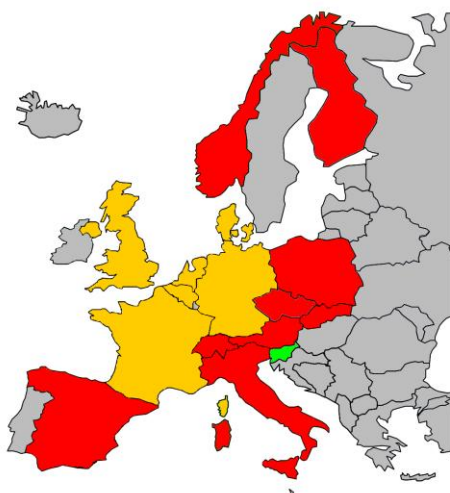
H<sub>2</sub>S + COS - Hydrogen sulphide + Carbonyl sulphide (max 5 mg/m<sup>3</sup>)

RSH - Mercaptans (max 6 mg/m<sup>3</sup>)

CO<sub>2</sub> - Carbon dioxide (2.5 mol %)

H<sub>2</sub>O DP - Water dew point (-8°C at 70bar)

HC DP - Hydrocarbon dew point (-2°C at 1-70bar)



#### Responses

	Milestone implemented	Milestone not implemented
Austria	0	1
Belgium	2	2
Czech Republic	0	1
Denmark	1	1
Finland	0	1
France	2	2
Germany	4	1
Hungary	0	2
Italy	0	2
Netherlands	2	4
Norway	0	1
Poland	0	1
Russia		
Slovakia	0	2
Slovenia	1	0
Spain	0	1
Switzerland	0	1
United Kingdom	1	2

Most respondents (25 out of 38) are still working towards the accomplishment of the parameters ranges and values described in CBP, as they were in previous surveys.

Three respondents said the milestone was not relevant to their company (Finland, and two from Netherlands). Progress was reported in Slovakia, Denmark and France.

Respondents in Belgium noted that all parameters have yet to be implemented except for one respondent who said that water dew point still needs to be implemented. The same parameters need to be implemented in UK and Slovakia with the addition of the hydrocarbon dew point.

All parameters need to be implemented in Italy, Switzerland, Slovakia, Poland and Norway. All parameters need implementation in Denmark with the exception of carbon dioxide.

Only water dew point has been implemented in France.

All parameters have been implemented in Netherlands except carbon dew point.

One respondent declined to comment noting that the issue is currently under discussion in CEN.

Respondents from Belgium reported that there are legislative and regulatory barriers needed changing due to the network code.

In Finland, existing contracts were the cause for the barriers to implementation.

Resources were mentioned as a barrier in Slovakia, as well as the quality of gas coming from Russia.

In Italy, solutions to implementation include a change to the network code, new software implementation and investments in treatment plants at national entry points.

Existing purchase arrangements are on-going barriers to implementation in numerous countries.

In France, respondents noted that this non-implementation of this milestone does not cause a barrier except for LNG imports, and Netherlands noted not really a barrier when sourcing from TTF or IP with Belgium / Germany.

Spain requires a change to the NGTS.

Existing TSO to TSO contracts are a barrier in Switzerland requiring change to the Interconnection Agreement with the Italian and German TSOs.

### 3.3 Recommended Gas Quality Parameters

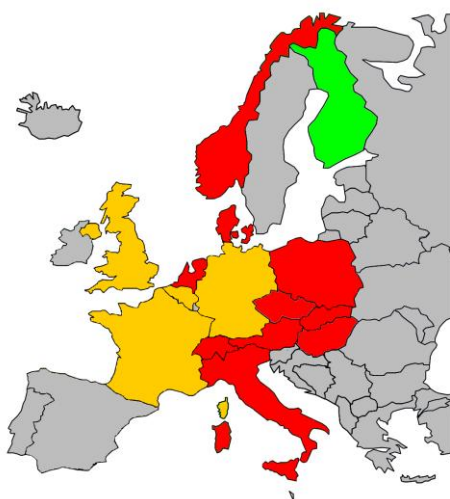
This milestone recommends the following gas quality parameters:

WI - Gross (Superior) Wobbe Index - 13.6 to 15.81 kWh/m<sup>3</sup>

d - relative density - 0.555 to 0.700

O<sub>2</sub> - Oxygen (\*) 0.001 mol%

(\*) Limit is <0.001 mol%, daily average. However, cross border point daily average levels up to 0.01 mol% will be accepted if these are the result of the prudent operation of UGS's, existing in 2006, which use oxygen for desulphurisation purposes.



The majority (26 out of 36) are still working towards the accomplishment of the parameters ranges and values described in the CBP.

<b>Responses</b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	0	1
Belgium	2	2
Czech Republic	0	1
Denmark	0	2
Finland	1	0
France	2	2
Germany	3	2
Hungary	0	2
Italy	0	2
Netherlands	1	5
Norway	0	1
Poland	0	1
Slovakia	0	2
Switzerland	0	1
United Kingdom	1	2

Wobbe Index requires implementation in all countries. A joint EASEE-gas/Marcogaz Pilot Project is working on harmonising the Wobbe Index of a select number of countries (Spain, France, Belgium, Germany and Denmark) based on the EASEE-gas CBP.

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The oxygen parameter needs implementation in Belgium, the Netherlands, France and UK.

All parameters need implementation in Italy, Poland and Slovakia.

Progress was reported in meeting the target for Belgium, Slovakia and Denmark.

It was noted that requirements in the UK were not compatible with the CBP. TSO to TSO contracts are a barrier in Netherlands as are TSO to other IO contracts.

Slovakia mentioned the quality of gas supplied from Russia is a problem.

Italy reiterated that there would need to be a change in contracts, network code and new software implementation to meet the requirements.

Existing purchase requirements are an ongoing barrier in Belgium, France, Netherlands, UK, Czech Republic, Hungary, Poland, Slovakia and Denmark.

Harmonization at EU level is yet to be legislated for at Member State level in Belgium to meet milestone.

Change to the NGTS is required in Spain to meet the milestone.

Existing TSO to TSO contracts are a barrier in Switzerland requiring change of the Interconnection Agreement with TSOs in Italy and Germany.

## 4 CBP 2005-002/02 Interconnection Agreements

*This Common Business Practice describes the scope of an Interconnection Agreement to be established by two adjacent TSOs, describing how to facilitate interoperability of the grids.*

*Implementation Date: 1st April 2009*

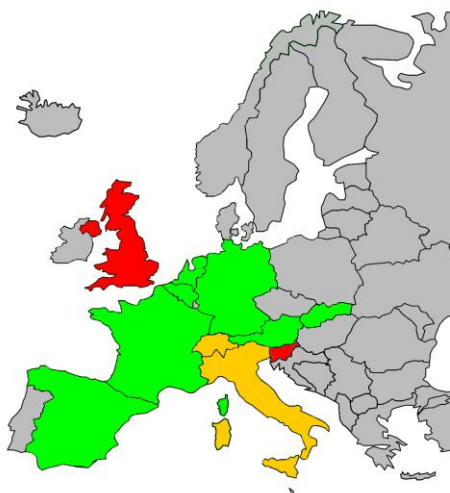
### 4.1 General comments on the CBP-2005-002-02

A respondent noted that as this matter is within the responsibility of the respective TSO's, as a shipper the requirements of the CBP can only be realized if at a certain IP e.g. allocation methods are used, that are in line with the CBP rules.

One respondent noted ENTSOG is currently working on the Interoperability and Data Exchange Network Code, which contains a section on Interconnection Agreements. When this Network Code comes into force, this CBP may need to be adjusted in line with the Network Code.

Another respondent noted that as not all entry and exit points have matching it is not needed for their process. This is especially the case for small producers.

### 4.2 Matching procedure



<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	1	0
Belgium	3	0
France	4	0
Germany	2	0
Italy	1	1
Netherlands	2	0
Slovakia	1	0
Slovenia	0	1
Spain	2	0
Switzerland	1	1
United Kingdom	0	1

Most (17 of 21) respondents noted this milestone as complete.

One respondent in UK and Slovenia listed this milestone as not relevant to their company.

This milestone is expected to be met on 1 January 2013 in Switzerland where the current barrier is existing TSO to TSO contracts requiring change of Interconnection Agreement with Italian TSO.

A respondent from UK noted that there is a need to change the network code via legislation. External operating procedures are a barrier to implementation in Austria.

### 4.3 Rules for Flow Control



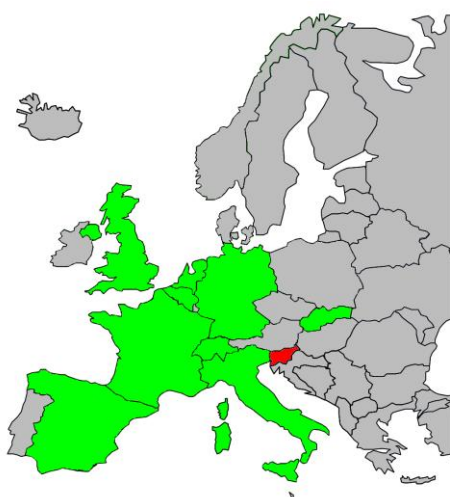
<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	3	0
France	3	0
Germany	2	0
Italy	0	1
Netherlands	2	0
Slovakia	1	0
Slovenia	0	1
Spain	2	0
Switzerland	1	0
United Kingdom	1	0

15 of 17 respondents reported this complete.

This milestone is not relevant to one respondent from Slovenia.

Specification a) (The IOs shall ensure that the flow should be as close as possible to targets, based on confirmed quantities.) has yet to be implemented in Italy. There has, however, been progress in this direction.

### 4.4 Measurement Principles of gas quantities and gas quality

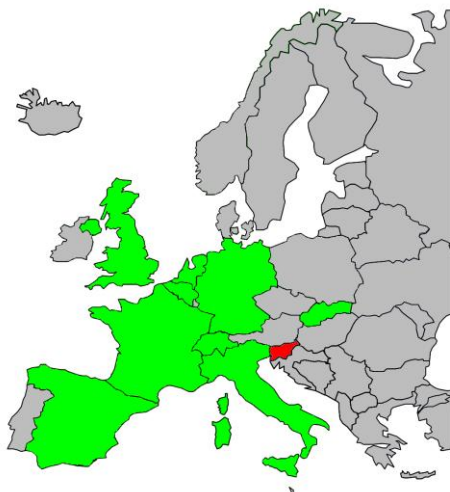


<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	3	0
France	3	0
Germany	2	0
Italy	1	0
Netherlands	2	0
Slovakia	1	0
Slovenia	0	1
Spain	2	0
Switzerland	1	0
United Kingdom	1	0

The majority of respondents (16 of 17) reported this milestone met.

One respondent from Slovenia reported this milestone as not relevant.

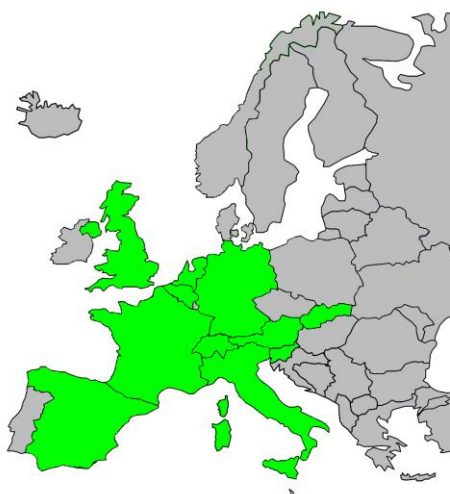
## 4.5 Gas Quality Specifications



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	3	0
France	3	0
Germany	2	0
Italy	1	0
Netherlands	1	0
Slovakia	1	0
Slovenia	0	1
Spain	2	0
Switzerland	1	0
United Kingdom	1	0

15 of 16 respondents indicated that gas specifications are in place.

## 4.6 Allocation Rules

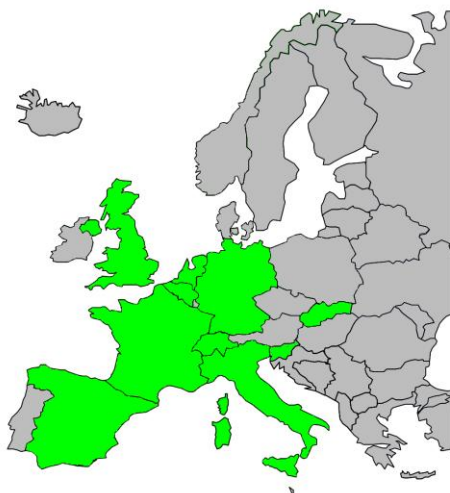


<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	1	0
Belgium	3	0
France	3	0
Germany	3	0
Italy	2	0
Netherlands	2	0
Slovakia	1	0
Slovenia	1	0
Spain	2	0
Switzerland	2	0
United Kingdom	1	0

All respondents indicated that Allocation Rules have been implemented according to the CBP.



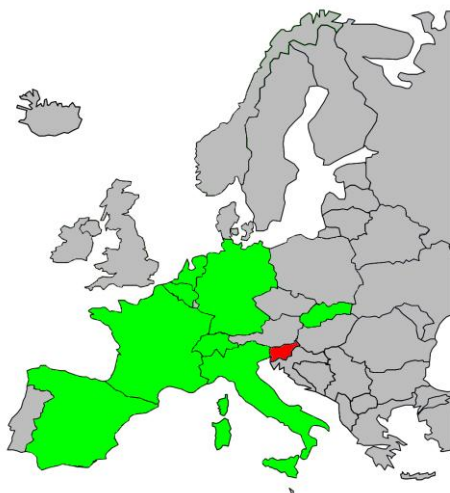
#### 4.7 Co-ordination of operation, information exchange and Exceptional events



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	3	0
France	3	0
Germany	2	0
Italy	1	0
Netherlands	2	0
Slovakia	1	0
Slovenia	1	0
Spain	1	0
Switzerland	1	0
United Kingdom	1	0

All the respondents (16) indicated that the principle of mutual information between IOs about all relevant matters that might affect the operation of their respective grids (e.g. maintenance) is included in the Interconnection Agreement.

#### 4.8 Changes to IA



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	3	0
France	2	0
Germany	2	0
Italy	1	0
Netherlands	2	0
Slovakia	1	0
Slovenia	0	1
Spain	1	0
Switzerland	1	0

Almost all of the respondents (12 out of 13) have implemented this milestone. One respondent from Slovenia said this milestone was not relevant to their company.



## 5 CBP 2005-003/01 Constraints

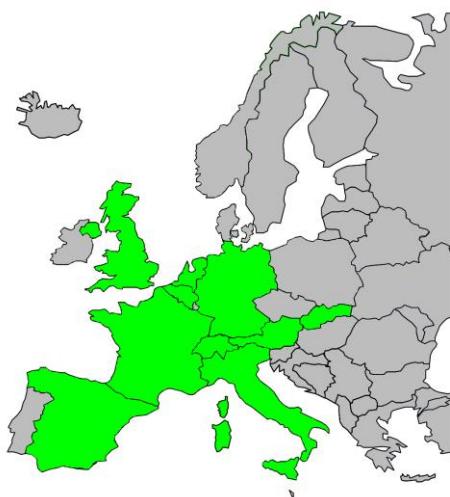
*This Common Business Practice describes the operational procedures to be applied where constraints arise due to unforeseen restrictions in transmission capacity or due to off-specification gas properties.*

*Implementation Date: 1<sup>st</sup> October 2006*

### 5.6 General Comments to CBP 2005-003/01

It was noted by one respondent that in the course of the establishment of new capacity allocation methods and rules due to the implementation of the 3rd package and the respective ENTSOG network code later on, there is a need to decide whether this CBP should stay in place as it currently is.

### 5.7 Inform TSO on nature and duration constraint



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	1	0
Belgium	4	0
France	3	0
Germany	2	0
Italy	1	0
Netherlands	3	0
Slovakia	1	0
Spain	2	0
Switzerland	1	0
United Kingdom	1	0

All the respondents (19) mentioned that communication procedures in case of constraints are in place according to the CBP.

## 5.8 Flow under Constraint Conditions and Flow Control



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	1	0
Belgium	4	0
France	3	0
Germany	2	0
Italy	1	0
Netherlands	3	0
Slovakia	1	0
Spain	2	0
Switzerland	1	0
United Kingdom	1	0

All the respondents (19) mentioned that rules are in place in case the quantities are affected by a constraint.

## 5.9 Nominations and Allocation



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	1	0
Belgium	4	0
France	2	1
Germany	2	0
Italy	1	0
Netherlands	3	0
Slovakia	1	0
Spain	2	0
Switzerland	1	0
United Kingdom	1	0

Most of the respondents (18 out of 19) stated that in case of constraint the normal nomination rules as agreed between IO and Shipper shall apply and that the Shippers shall not be obliged to re-nominate during a constraint.

A resolution is expected in France and is an ongoing discussion with shippers because in some situations of under availability, shippers don't recover (and must renominate) after the constraint has disappeared.

## **6 CBP 2007-001/01 Message Transmission Protocol and CBP 2007-002/01 Common Data Communications Network**

*These Common Business Practices specify the use of AS2 for the transmission of Edig@s messages. The specification assumes adoption of the Common Business Practice for the Data Network. The Common Business Practice promotes the use of the public internet as the platform for business to business messaging between organisations involved in the delivery of gas from the producer to the end users.*

*Implementation Date: 31<sup>st</sup> December 2009*

### **6.1 General Comments to CBP 2007-001/01**

It was noted by one respondent that EDIG@S is not in use in all the countries and that in cases where it is used these CBPs are implemented.

One respondent noted that considering the 3rd energy package and the separation of the market roles it could be interesting to analyse the increasing applications for the EASEE-gas membership and EASEE-gas certificates.

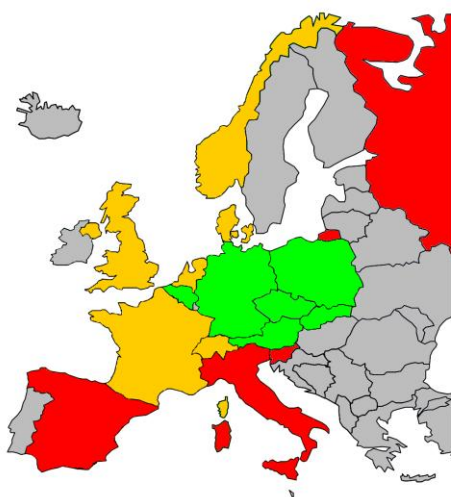
Another respondent noted ENTSOG is currently working on the Interoperability and Data Exchange Network Code and that when this comes into force they will make the modifications required.

Yet another respondent noted that they do not use the EASEE-gas certificate but are using third party certificates and another respondent noted not every shipper wants to get a certificate from the EASEE-gas organization. Reasons given in relation to this are:

- They are not seen as secure enough
- They don't want to become a member of the EASEE-gas organisation
- The EASEE-gas certificate is too expensive compared to other certificates

One respondent noted that the Edig@s protocol is actually not implemented by their information systems but that it is foreseen that in the future their gas managements system (currently at early stages of planning phase) will be compliant to Edig@s protocol.

## 6.2 Use of the public Internet as the data network for the transmission of Edig@s messages



30 respondents out of 44 declared they use public Internet as the data network for the transmission of Edig@s messages. From a geographical point of view, a more widespread adoption is visible in north-western Europe.

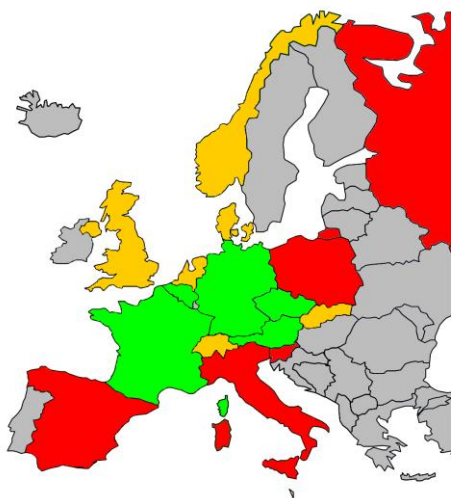
<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	2	0
Belgium	7	0
Czech Republic	1	0
Denmark	1	1
France	4	1
Germany	5	1
Italy	0	2
Netherlands	4	1
Norway	1	1
Poland	1	0
Russia	0	1
Slovakia	2	0
Slovenia	0	1
Spain	0	2
Switzerland	1	1
United Kingdom	1	2

Progress was reported by respondents in Italy in reaching the target.

Regulatory and legislative changes are required in Spain. External operating procedure was mentioned as a barrier in Italy, Austria and Slovenia.

Internal resource or financial costs as barriers to implementation was cited by some members (Netherlands, France, Germany, Norway, UK, Switzerland, Italy, Russia).

### 6.3 Applicability Statement 2 (AS2) is used to transmit Edig@s messages between organizations



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	2	0
Belgium	7	0
Czech Republic	1	0
Denmark	1	1
France	5	0
Germany	5	1
Italy	0	2
Netherlands	4	1
Norway	1	1
Poland	0	1
Russia	0	1
Slovakia	1	1
Slovenia	0	1
Spain	0	2
Switzerland	1	1
United Kingdom	1	2

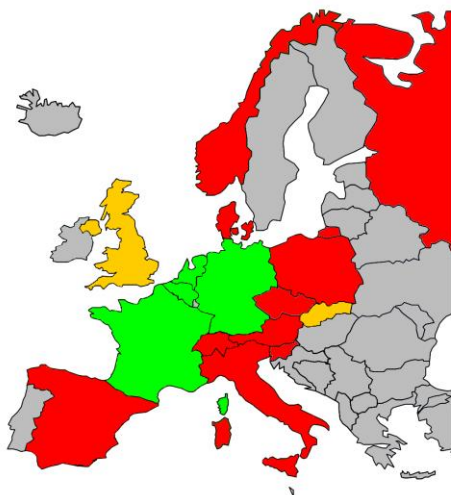
29 respondents out of 44 use the AS2 protocol. Switzerland 1  
North-Western Europe seems to be slightly ahead United Kingdom 1  
in implementing AS2 as their means to exchange  
Edig@s messages. However, this is a clear improvement from previous surveys.

Progress in setting a target date was reported in Italy and Slovakia.

Legislative and regulatory barriers exist in Spain. Internal resources are a barrier for implementation in Russia, Italy, Switzerland, UK and Norway.

Regulatory changes are required in Poland and Slovakia, where transport contracts are barriers to implementation. Changes need to be made in the Polish market model to allow Edig@s messages to be used. External operating procedures are a barrier in Denmark and Slovenia, with additionally internal operating procedures a barrier in Italy.

### 6.3 Security Certificates are retrieved from the EASEE-gas certificate service



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	0	2
Belgium	7	0
Czech Republic	0	1
Denmark	0	2
France	5	0
Germany	6	0
Italy	0	2
Netherlands	5	0
Norway	0	1
Poland	0	1
Russia	0	1
Slovakia	1	1
Slovenia	0	1
Spain	0	2
Switzerland	0	2
United Kingdom	1	2

Two-third (25 out of 43) of the respondents have already obtained their EASEE-gas security certificate, or are in the process of obtaining one.

The Netherlands, France, Belgium and Germany are among the main users of certificates.

One respondent each in Austria and Slovenia reported that the CBP was not relevant to their company.

Barriers to implementation in Spain include a need to change the existing legal rules for technical management of gas system, as well as existing transport contracts.

Support from TSOs is required to advance the CBP in UK.

Existing external operating procedures were cited as barriers for Italy, Switzerland, UK and Norway. In Czech Republic, Austria, Slovakia and Poland, existing transport contracts are a barrier to implementation and require a change in regulation. For Italy, internal and external operating procedures were cited as a barrier.

Barriers to implementation in Switzerland are internal resources.

## **7 CBP 2007-003/01 Company's Identifier Encoding and CBP 2007-004/01 Connection Point Identifier Encoding**

*This Common Business Practice 2007-003/01 promotes the use of a specific encoding system for company identifiers in electronic messages, exchanged in gas transactions among gas market Players.*

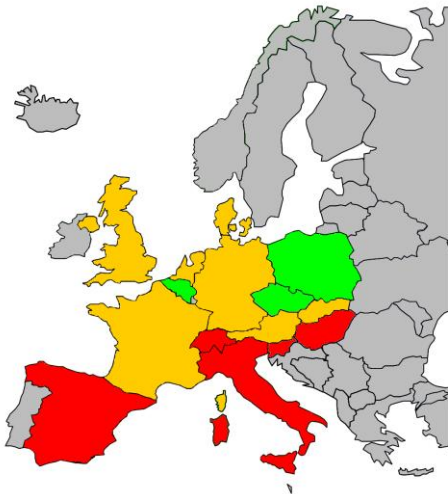
*This Common Business Practice 2007-004/01 promotes the use of a specific encoding system for connection point identifiers in electronic messages, exchanged in gas transactions among gas market Players.*

### **7.1 Comments on CBP 2007-003/01 and CBP 2007-004/01**

It was noted by one respondent that "as the EIC code is only partly used in the communication, we cannot give a final and complete answer to this question"

One respondent noted that they apply the EIC codes with only 2 partners: a shipper and an electricity producer. It was reported that there was a misunderstanding of the CBP in the old IT system of the company and the only EIC code partner could be used.

## 7.2 To encode company's ID by ENTSOe EIC-X code structure



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	1	2
Belgium	6	1
Czech Republic	2	0
Denmark	1	1
France	4	1
Germany	2	3
Hungary	0	1
Italy	0	2
Netherlands	4	1
Poland	1	0
Slovakia	1	1
Slovenia	0	1
Spain	0	1
United Kingdom	1	2

Implementation date: 1 February 2010

23 respondents out of 40 use the ENTSOe EIC-X code structure to encode a Company's ID.

A respondent from Spain said the CBP would require a change in the network code

Progress was reported in Italy to meeting the target without a specific date mentioned.

The milestone was noted as not relevant for Hungary, Poland and Slovakia.

One respondent in Germany and Austria mentioned that they expect to meet the requirements in 2013.

A regulatory change is required to meet the milestone in Germany. One respondent noted that harmonization of German and European approach is needed as in Germany also a company's encoding according to DVGW-Code should be accepted. Therefore the respondent leaves the choice of which coding to their business partners. Another respondent noted that existing transport contracts is also a barrier to implementation.

The milestone has not been reached in Italy because of internal and external operating procedures as all the information systems are based on other codification. The shift to another kind of codification is supposed to have a relevant impact on information systems and internal procedures.

A regulatory change is also required in Slovakia where existing transport contracts are a barrier.

A change to a new market model is required in Austria to meet the requirements there.

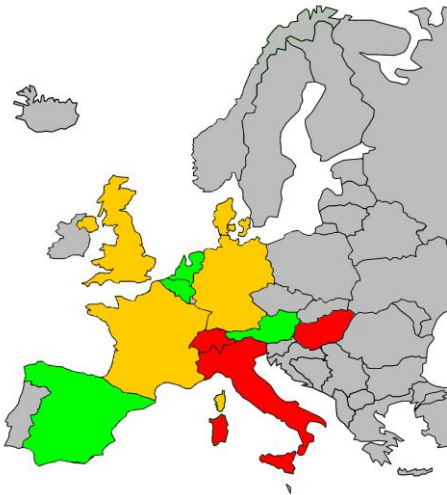
Internal resources were cited as a problem for implementation in Netherlands, UK, Belgium and France.

It was noted that in Belgium there is still no requirement to use EIC codes.

The milestone has not been reached in Switzerland due to internal resources.



### 7.3 To encode Connection Point Ids by the ENTSOe EIC-Z code structure



<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	2	0
Belgium	11	0
Denmark	1	4
France	1	4
Germany	2	6
Hungary	0	1
Italy	0	5
Netherlands	8	0
Slovakia	0	1
Spain	4	0
Switzerland	0	1
United Kingdom	1	4

Implementation date: 1 October 2008

All responses from Austria, Netherlands, Spain and Belgium report this milestone accomplished, whereas the picture is more mixed in France, Germany and UK. No responses from Italy or Hungary reported the milestone reached.

The milestone was reported as not relevant in Denmark (2 yes, 2 no) and Belgium (3 yes).

Internal and external operating procedures are barriers in Italy.

Slovakia said that this is not a requirement from their IO and has not been met.

Barriers in Germany include internal resource availability.

Internal operating procedures requiring a new implementation to be set up are a barrier in France, as are existing SSO and LNG operator contracts.

## 8 CBP 2007-005/01 EDIG@S and CBP 2007-004/01 EDIG@S Release Periods

*This Common Business Practice describes the EDIG@S versioning process and the use of the EDIG@S protocol for the exchange of sales, infrastructure and service business information between parties in the European gas market. This Common Business Practice describes the how EDIG@S releases shall be managed, functionally and technologically.*

### 8.1 General Comments on CBP 2007-005/01

One respondent noted that EDIG@S is not used or supported in Italy or Hungary and is only used partly in Austria. There is often a second or a third possibility to communicate, which is positive in the case of a technical problem.

One respondent noted that according to the CBP Edig@s Release Periods older versions are still supported, this is not the case for some TSOs which are only supporting the latest version in one format.

One respondent noted they have implemented the Edig@s version 4 because an important IT system version had to be implemented for the new tariff in France. Now, at least 70% of their partners are using Edig@s version 4.

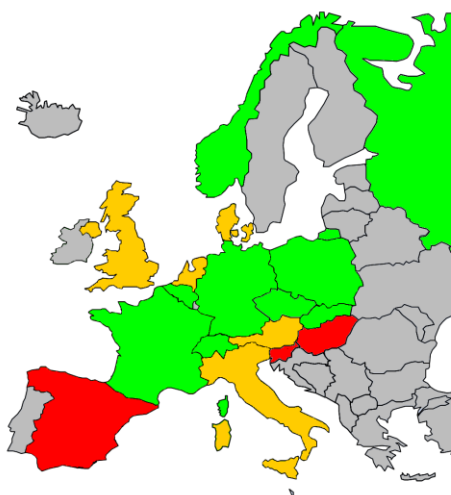
One respondent noted that it is difficult to remove unsupported releases. This is because shippers and NNO's do not always update to the latest versions, which means that still support version 2 and 3 (next to 4 and parts of 5).

One respondent noted that Edig@s protocol is not implemented by their information systems. It is foreseen that in the future their gas management system (currently at early stages of planning phase) will be compliant to Edig@s protocol.

## 8.2 CBP 2003-003/02 EDIG@S Protocol

*The original CBP on EDIG@S recommends its use but has no implementation date.*

*EASEE-gas recommends for current practice the use of the official version of the EDIG@S protocol for the exchange of sales, infrastructure and service information between parties in the European gas market, as described in the Edig@s Message Implementation Guidelines (MIG).*



### Responses

	Milestone implemented	Milestone not implemented
Austria	3	1
Belgium	7	0
Czech Republic	1	0
Denmark	1	1
France	6	0
Germany	9	0
Hungary	0	1
Italy	1	3
Netherlands	4	1
Norway	2	0
Poland	1	0
Russia	1	0
Slovakia	2	0
Slovenia	0	1
Spain	0	2
Switzerland	3	0
United Kingdom	2	1

Most respondents (44 out of 54) indicated that they are using the official version of Edig@s protocol.

The CBP is not relevant in Austria and Italy.

Progress towards a target date has been reported in Germany.

Spain noted that current barriers include a need to make changes to the IT system. Changes to legislation and regulation are also required.

Existing TSO contracts are a barrier to implementation in UK.

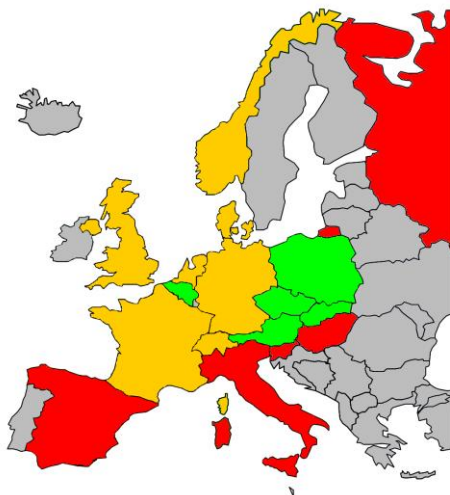
It was noted that Germany still uses the German version of EDIG@S which sometimes causes problems with dealings between TSOs.

External operating procedures are a barrier in Denmark, Italy and Austria.

Internal operating procedures are also a barrier in Italy.

### 8.3 CBP 2007-005/01 EDIG@S Release Periods

*In this CBP, EASEE-gas defines the evolution of gas business transaction releases. Full implementation required by 1 January 2010.*



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	3	0
Belgium	6	0
Czech Republic	1	0
Denmark	1	1
France	4	1
Germany	7	2
Hungary	0	1
Italy	0	3
Netherlands	4	1
Norway	1	1
Poland	1	0
Russia	0	1
Slovakia	2	0
Slovenia	0	1
Spain	0	2
Switzerland	1	1
United Kingdom	1	2

Most respondents (33 out of 49) indicated that the milestone has been implemented.

Progress towards the target was reported in Italy, France and Germany.

Internal and external operating procedures are barriers in Italy.

External operating procedures are a barrier in Denmark.

Internal resources are a barrier in Netherlands, France, Germany, Norway, UK, Switzerland and Italy

Internal resources and existing sale and purchase contracts are barriers in Russia.

It was noted that if the UK TSO pushes for the adoption, EDIG@S will become standard in UK.

Regulatory and legislative changes are required in Spain as Spanish rules for nominations are defined by technical manager of the system which are different from and do not follow the CBP.

## 9 CBP 2007-006/01 Harmonisation of the Allocation Information Exchange

*This CBP defines processes and principles which shall be applied between Transmission System Operators (TSOs) or allocation agent, as applicable, and shippers at major Interconnection Points (IP) and will be applied at other IPs whenever practical.*

*In the allocation process a distinction shall be made between provisional allocation (the calculation of which is based on non-validated metered data) and definitive allocations (the calculation of which is based on validated metering values).*

*The implementation of this CBP shall be no later than 1 April 2008.*

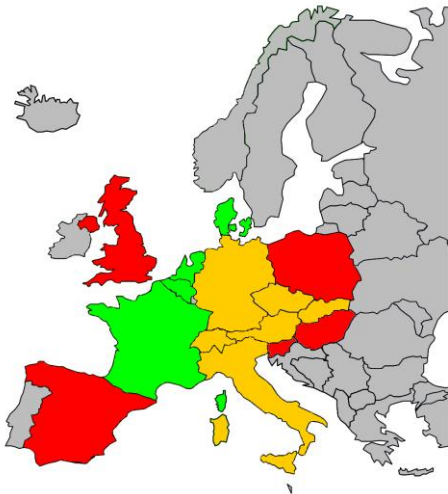
### 9.1 General Comments to CBP 2007-006/01

It was noted by one respondent that this information procedure differs between the countries depending on their rules and regulation.

One respondent noted that in the German market the operators of the HUBs are responsible for collecting allocation data from the TSOs and DSOs in an hourly regime and forwarding those to the shippers. In France the TSO sends out these collected data in a daily regime directly to the shippers.

One respondent noted QB1 T10 days is true for most measuring points. At some measuring points (some border and producer points) definitive allocations are available 16 working days after the month of delivery. 16 days is agreed on in Dutch law (Allocatievoorwaarden gas).

### 9.2 Provisional allocation: at a frequency which is consistent with the balancing regime on force



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	2	2
Belgium	6	0
Czech Republic	1	1
Denmark	2	0
France	5	0
Germany	4	2
Hungary	0	1
Italy	2	1
Netherlands	6	0
Poland	0	1
Slovakia	1	1
Slovenia	0	1
Spain	0	1
Switzerland	1	1
United Kingdom	0	2

The provisional allocation procedure is implemented by the majority of systems (30 out of 44).

One response from Spain noted that when the balancing network code and/or the interoperability network code will come into force, modifications may be carried out, if required.

The CBP is not relevant to one response from Italy and Spain.

Transition is expected in Austria by 2013 and progress towards a target date was reported in UK.

One UK response noted that not all producers or terminals supply within a day or two. Some terminals are very late in supplying allocations (over 5 days minimum).

One German response noted that meter readings are an issue so they are getting readings sent from the TSO, not the operator.

Respondents from Czech Republic noted that there are barriers due to existing transport contracts and regulation and legislation as there is no distinction between provisional and final allocations, only allocations based on OBA.

Barriers for implementation in Austria include existing transport contracts, TSO to TSO contracts as well as requiring regulation and legislative changes. It was noted that for Austria no distinction between provisional and final allocations is made but only for allocations based on OBA.

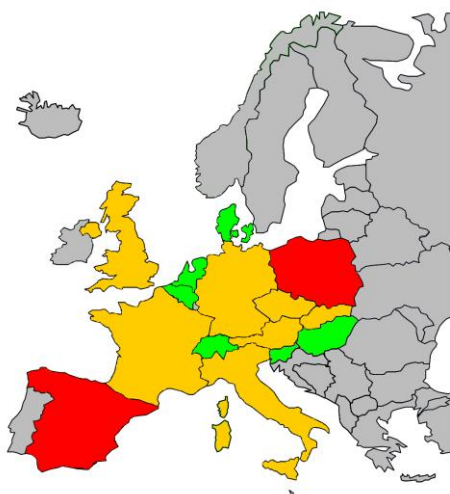
Poland, Slovakia and Germany have barriers due to existing transport contracts, internal and external operating procedures. Legislative and regulatory changes also need to be made to allow for the implementation of this milestone. Removal of barriers in Germany also requires that provisional allocations (for metered customers) arrive at noon after the gas day.

Barriers for implementation in Switzerland are existing TSO to TSO contracts.

One response noted that for Austria and Slovakia, no distinction is made between provisional and definite allocations.

To remove the barriers for implementation in Poland, there is a need for a mix of hourly and daily allocation, depending on the border points and the adjacent TSO.

### 9.3 Definite allocation: not later than ten working days after the month of delivery



Most markets (31 out of 40) adopted the procedure for definitive allocation.

<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	3	1
Belgium	5	0
Czech Republic	1	1
Denmark	2	0
France	4	1
Germany	3	1
Hungary	1	0
Italy	2	1
Netherlands	5	0
Poland	0	1
Slovakia	1	1
Slovenia	1	0
Spain	0	1
Switzerland	2	0
United Kingdom	1	1

One respondent from Spain noted that when the balancing NC and/or the interoperability NC will come into force, changes may be required.

One respondent from Slovenia and one from Spain noted that this milestone is not relevant for their company.

A target date for completion in Austria was given for 2013.

Some respondents noted that the milestone has not been implemented because the some fields are late in providing allocation data and behind the timeline set by CVA. It is unclear how to get them to send their allocations in a timely manner. Continuous contact has been made with no change.

One respondent from Belgium noted that allocations for TSO IP are sent before the 10th working day after the end of the month. Allocations for end-users are provided before the 20th day after the end of the month as definitive metering values are required.

Existing transport contracts are a barrier in Czech Republic where regulation and legislative changes need to be made before the milestone can be implemented. Actions necessary to remove these barriers include a removal of distinction between provisional and final allocations. Existing transport contracts are additionally barriers to implementation in Austria, Slovakia, Poland, France and Germany where regulatory and legislative changes need to be made before the milestone can be implemented.

In Slovakia and Poland, there is no distinction made between provisional and definite allocations.

In France, it was noted by one respondent that definitive allocations arrive within approximately 15 working days after the month and in Germany definitive allocations arrive within 15 to 20 working days after the month.

## 10 CBP 2008-001/01 Secondary Capacity Trading

*This CBP defines a set of processes and principles to be used by Transmission System Operators ("TSOs") and Shippers to facilitate trading of capacity rights as defined in article 8 of Regulation (EC) No 1775/2005 of the European parliament and of the Council of 28 September 2005 on conditions for access to the natural gas transmission network ("EC Regulation 1775/2005"), commonly known as secondary capacity trading.*

*In short, this CBP defines the process of the transfer of capacity from one shipper to the other, following the commercial agreement between these shippers, as at the time of drafting this CBP this is one of the most significant bottlenecks in the trading process and a harmonized process will provide a first step towards an improved secondary capacity market.*

*The CBP shall apply to all capacity trades on the secondary market. It does not apply directly to the primary allocation of transportation capacity, including use it or lose it (UIOLI).*

*Implementation date: May 2009*

The questionnaire on secondary capacity trading was divided in three segments: general responses, SSOs and LNG Operators. For the last two segments, no CBP is implemented but EASEE-gas considered it important to monitor the situation in these segments.

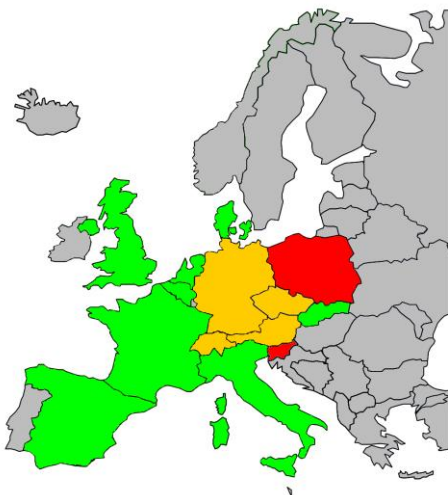
### 10.1 General Comments to CBP 2008-001/01

It was noted by one respondent that this CBP needs to be revised to bring it in line with the ENTSO network codes for CAM, BAL, etc. The CBP could then provide more detailed information for these areas.

One respondent noted the TSO responds quickly on requests on transfers of capacity, but has the right to use up to five working days. This does not guarantee a quick response, but in general the response is very well and quick enough.

### 10.2 General responses on the CBP 2008-001/01

#### 10.2.1 Terms and Conditions for Shippers to Use Capacity Transfer Process



<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	1	1
Belgium	6	0
Czech Republic	1	1
Denmark	2	0
France	5	0
Germany	4	1
Italy	2	0
Netherlands	5	1
Poland	0	1
Slovakia	1	0
Slovenia	0	1
Spain	2	0
Switzerland	1	1
United Kingdom	3	0

The large majority of markets (33 out of 40) indicated that the TSO has set a framework of standard terms and conditions that Shippers need to sign up to before they are eligible to use the capacity transfer process and make it readily available to Shippers. Such terms and conditions standardize the rights and obligations of the Shippers with regard to the provision, transfer and use of the capacity and ensure that participating Shippers have appropriate financial strength to trade capacity according to the relevant TSO.

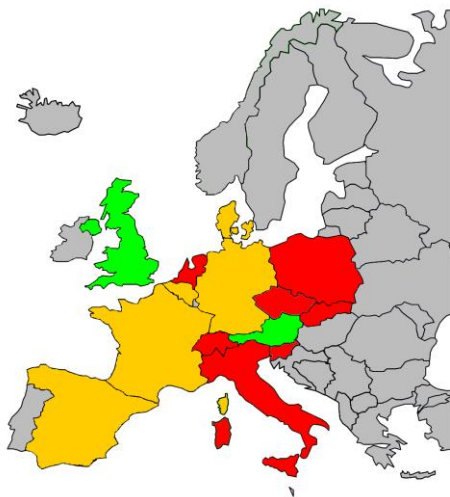


One respondent from Austria noted a target date of completion as April 2013.

Internal resources were noted as a barrier from Germany and internal operating procedure is a barrier in Netherlands.

Existing bilateral transport contracts is a barrier for implementation in Czech Republic. Existing transport contracts are a barrier for implementation in Slovenia as well as Poland where there is a need to change regulation and legislation to implement this milestone. Action required to counter these barriers include the need to establish an anonymous platform for capacity trade, standard procedures and contracts for different kinds of secondary capacity trade.

#### 10.2.2 TSO will facilitate capacity transfer process following proposed trade structure combinations



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	0	2
Belgium	4	1
Czech Republic	0	2
Denmark	1	1
France	3	1
Germany	1	3
Italy	0	2
Netherlands	1	5
Poland	0	1
Slovakia	0	1
Slovenia	0	1
Spain	1	1
Switzerland	0	2
United Kingdom	2	0

Only 13 out of 36 respondents indicated that the TSO facilitates the capacity transfer process with the two (2) hour lead time as described in paragraphs 6.1 and 6.2 of CBP through at least one of the following trade structure combinations:

- the Transfer trade structure whereby the usage rights of the transportation capacity are transferred from the Holder to the Receiver in the TSOs System and the contractual rights, including payment and credit obligations remain with the Holder;
- the Assignment trade structure whereby the Receiver is contractually substituted for the Holder and the Assignment is communicated to the TSO. All rights are transferred to the Receiver and payment for the transferred capacity is to be made by the Receiver instead of the Holder.

Progress towards a target date was reported in Denmark, Slovakia, Austria, Belgium, Czech Republic and the Netherlands.

One respondent from the Netherlands reported this CBP was not relevant to them.

One respondent noted that to implement the milestone in the Netherlands there is a need to lower the 1 day lead time (4 business days if not done under GEA) to 2 hours. External operating procedures were also cited as a barrier in the Netherlands as well as the existing network code TSO to TSO contract. Also, within day transfers of capacity not being possible was cited as a barrier. The barrier arises because the TSO does not formally support a two hours before closure of the market deadline. Usually, TSO does support this time, but has a formal handling period of



up to five working days. A new procedure for handling periods for trading would be needed to implement this milestone.

External operating procedures were cited as barriers in Czech Republic, Belgium and Austria.

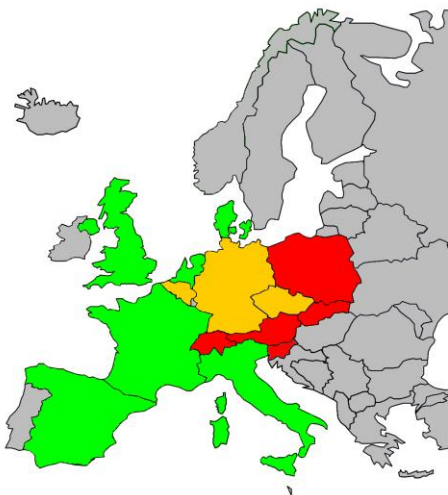
Existing transport contracts are a barrier in Slovakia. TSOs' IT systems are also a barrier in Slovakia and Poland. For Slovakia it was noted that both trade structures are in place by the TSO, but there is no IT platform to allow a fully automated process. In Poland, IT implementation, and a need to shorten week or month long deadlines in the network code, is needed before the milestone can be implemented.

In Germany and France existing TSO to TSO contracts are a barrier and regulation needs changing before the milestone can be implemented. Internal resources are an additional barrier to implementation in Germany.

The existing network code is a barrier to implementation in Italy.

One respondent from Switzerland has not implemented the milestone yet as it has not been identified as a demand by shippers.

### 10.2.3. Requirements for capacity transfer process



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	0	2
Belgium	4	1
Czech Republic	1	1
Denmark	2	0
France	4	0
Germany	2	2
Italy	2	0
Netherlands	4	2
Poland	0	2
Slovakia	0	2
Slovenia	0	1
Spain	2	0
Switzerland	0	2
United Kingdom	2	0

Most respondents (23 out of 38) indicated that all products (both long and short term) and segments of products (comprising shorter contract periods and/or smaller amounts than the original purchased capacity) that are offered on the primary market, can be traded on the secondary market and transferred through the capacity transfer process of the TSO, that is assisted by ITC systems.

The capacity transfer process and systems fulfils the following requirements:

- a) Non-discriminatory and easy access to the communication and information system related to the capacity transfer process by all Shippers which have signed up to the terms and conditions of the TSO;
- b) Simultaneous use of the process by all Shippers;
- c) Transparency of all terms and conditions surrounding the process of capacity transfer;
- d) Compatible user interface to systems currently used and accepted in the market;

e) No system limitations which prevent instantaneous response to requests;

f) Shippers have access to relevant and up-to-date information in the context of the process.

The milestone is expected to be completed in Austria, and progress towards a completion date was noted for Slovakia.

The Milestone is not relevant for one company in Poland and one in Slovakia.

The network code and external operating procedures are barriers to implementation in Slovenia. In Poland, existing transport contracts are a barrier to implementation, and legislation and regulatory changes need to be made before the milestone can be implemented, namely the abolition of the separation and different standards in open seasons and standard auctions or capacity applications. TSO IT systems are also a barrier to implementation.

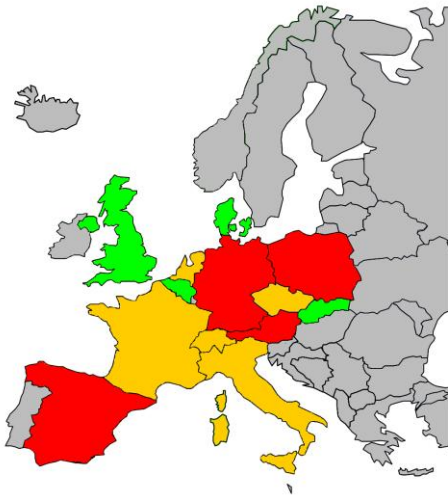
In Slovakia, existing transport contracts and TSO IT systems are a barrier.

In Austria and Czech Republic, legislative and regulatory changes need to be made before the milestone can be met.

External operating procedures are a barrier in Belgium, Netherlands and Germany. Internal resources are an additional barrier to implementation in Germany. In the Netherlands, action required to remove the barrier is for an answer to a request to be given within 2 hours (currently within 2 hours).

Switzerland identified that this milestone was not a demand identified by shippers as a requirement and for this reason has not been implemented.

#### 10.2.4. 5 days' notice if capacity transfer process not in place



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	0	2
Belgium	4	0
Czech Republic	1	1
Denmark	2	0
France	2	1
Germany	0	3
Italy	1	1
Netherlands	3	2
Poland	0	1
Slovakia	1	0
Spain	0	2
Switzerland	1	1
United Kingdom	1	0

Approximately half of respondents (15 out of 29) indicated that for all trade structures offered by the TSO for which the capacity transfer process is not (yet) in place and manual intervention is required, a Shipper shall provide to the TSO five working days' notice before the capacity transfer becomes effective, or a shorter time if agreed by the TSO.

The milestone is expected to be implemented in Germany and France. Progression towards as target date has been made in Austria, Czech Republic and Netherlands.

Financial cost is a barrier to implementation in Germany and France, as are external operating procedures. Internal resources are a barrier to implementation in Germany. Process definition and automation is required in Germany before this milestone can be implemented.

Existing transport contracts are a barrier in Poland and legislative and regulatory changes need to be made before the milestone can be implemented.

External operating procedures are a barrier to implementation in Austria, Czech Republic and the Netherlands. One respondent noted that notice is 10 working days in advance when not using the web platform.

In Spain, regulatory and legislative changes are required before the milestone can be implemented.

## 10.2 SSOs

### 10.2.1 General Comments

One respondent noted that their company applies contracts with shippers as defined in the TSC (Transmission Service Conditions) in which also the rules are set forth with regards to secondary capacity trading.

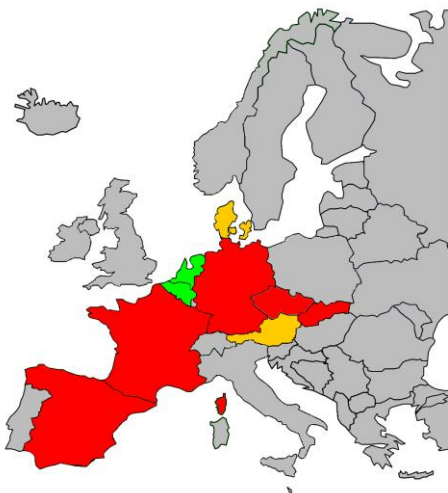
### 10.2.2 Terms and Conditions for Shippers to use capacity transfer process



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	2	0
Belgium	2	0
Czech Republic	1	0
Denmark	2	0
France	2	0
Germany	2	0
Netherlands	2	0
Slovakia	2	0
Spain	2	0

All respondents (17 out of 17) indicated that the SSO has set a framework of standard terms and conditions that Shippers need to sign up to before they are eligible to use the capacity transfer process and make it readily available to Shippers. Such terms and conditions standardize the rights and obligations of the Shippers with regard to the provision, transfer and use of the capacity and ensure that participating Shippers have appropriate financial strength to trade capacity according to the relevant SSO.

### 10.2.3 SSO facilitate capacity transfer process following trade structure combination



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Austria	1	1
Belgium	2	0
Czech Republic	0	1
Denmark	1	1
France	0	2
Germany	0	2
Netherlands	1	0
Slovakia	0	2
Spain	0	2

Half of the respondents (5 out of 11) indicated that the SSO does not facilitate the capacity transfer process with the two (2) hour lead time as described in paragraphs 6.1 and 6.2 of CBP.

Progress towards a target date was reported for Slovakia where financial costs and internal and external operating procedures are barriers. It was noted that the lead time of two hours seems

sometimes too strict as there are situations when SSO needs to prepare its IT systems, as well as check the new client, if they fulfil all the necessary obligations in order to become a client of the SSO, similarly as if they would like to become a primary customer. The SSO also needs to confirm the relevant data also with the IO.

Progress towards a target date was reported for Germany and France.

In Austria and Germany a lead time of more than 2 hours was noted as a barrier.

Respondents from Germany and France cited internal resources, existing transport contracts and TSO to TSO contracts as barriers, as well as internal and external operating procedures. In Germany and France, a suitable Day-Ahead Process needs to be established to allow for the implementation of this milestone. It was noted however that the IT-standard of the TSO's and trading web interfaces do not allow intraday procedures. In France, the SSO is a barrier to implementation. At the moment, 10 days' notice is required but this needs to be lowered to an answer within 3 days.

In Spain, regulatory and legislative changes need to be made to allow for the implementation of this milestone.

### 10.2.3 Requirements for capacity transfer process



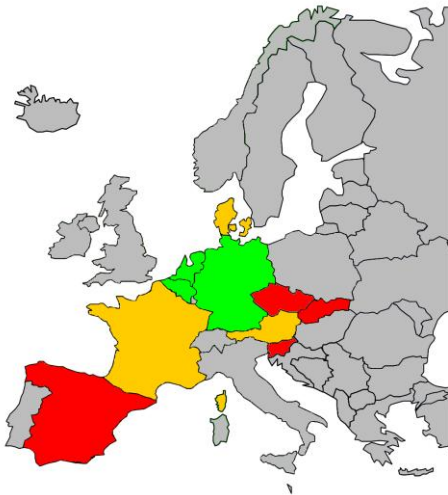
<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	2	0
Belgium	2	0
Czech Republic	1	0
Denmark	2	0
France	1	1
Germany	2	0
Netherlands	1	0
Slovakia	1	1
Spain	2	0

Most respondents (14 out of 16) indicated that all products (both long and short term) and segments of products (comprising shorter contract periods and/or smaller amounts than the original purchased capacity) that are offered on the primary market, can be traded on the secondary market and transferred through the capacity transfer process of the SSO, that is assisted by ITC systems.

Progress towards the target date was reported in Slovakia.

Financial costs and external operating procedures remain a barrier in Slovakia, and legislative changes are required to implement the milestone. The respondent noted that at the moment they are running a bulletin board as a web-space to facilitate the secondary market, where clients may put their offers and requirement concerning the secondary trading, in order to find a counter party for this trade.

#### 10.2.4 5 days' notice if capacity transfer process not in place



<b><u>Responses</u></b>	<b>Milestone implemented</b>	<b>Milestone not implemented</b>
Austria	1	1
Belgium	2	0
Czech Republic	0	1
Denmark	1	1
France	1	1
Germany	2	0
Netherlands	1	0
Slovakia	0	1
Slovenia	0	1
Spain	0	2

Half of the respondents (8 out of 16) indicated that for all trade structures offered by the SSO for which the capacity transfer process is not (yet) in place and manual intervention is required a Shipper shall provide to the SSO five working days' notice before the capacity transfer becomes effective, or a shorter time if agreed by the SSO. In this case, SSOs shall respond to the request within 5 working days, or a shorter period if agreed by the SSO.

One respondent from Denmark reported this milestone as not relevant to their company.

Progress towards a target date was reported in Slovakia. Barriers to implementation in Slovakia are financial costs, and legislation and regulation need to be changed.

In France existing SSO contracts were cited as barriers. Action required to remove barriers are "10 days for TIGF".

In Spain, legislative and regulatory changes need to be made to the NGTS to meet this milestone.

## 10.3 LNG Operators

### 10.3.1 Terms and Conditions for Shippers to use capacity transfer process



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	2	0
France	1	0
Netherlands	1	1
Spain	2	0

Most respondents (6 out of 7) mentioned that the LNG Operator has set a framework of standard terms and conditions that Shippers need to sign up to before they are eligible to use the capacity transfer process and make it readily available to Shippers. Such terms and conditions standardise the rights and obligations of the Shippers with regard to the provision, transfer and use of the capacity and ensure that participating Shippers have appropriate financial strength to trade capacity according to the relevant LNG Operator.

One respondent from the Netherlands noted that this CBP does not apply to their company.

### 10.3.2 LNG facilitate capacity transfer process following trade structure combination



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	1	0
France	0	1
Netherlands	0	1
Spain	0	2

Only one of five respondents mentioned that the LNG Operator will facilitate the capacity transfer process with the two (2) hour lead time as described in paragraphs 6.1 and 6.2 of CBP.

France mentioned that barrier to implementation is the LNG operator contract.

In Spain, changes need to be made to the existing legislation and regulation to meet this milestone.



### 10.3.3 Requirements for capacity transfer process



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	1	0
France	0	1
Netherlands	0	1
Spain	2	0

Most respondents (3 out of 5) mentioned that all products (both long and short term) and segments of products (comprising shorter contract periods and/or smaller amounts than the original purchased capacity) that are offered on the primary market, can be traded on the secondary market and transferred through the capacity transfer process of the LNG Operator, that is assisted by ITC systems.

It was noted that for France, there is a web platform in place, but no instantaneous response.

### 10.3.4 5 days' notice if capacity transfer process not in place



<b><u>Responses</u></b>	Milestone implemented	Milestone not implemented
Belgium	1	0
France	0	1
Spain	0	2

Only 1 respondent out of 5 indicated that for all trade structures offered by the LNG Operator for which the capacity transfer process is not (yet) in place and manual intervention is required a Shipper shall provide to the LNG Operator five working days' notice before the capacity transfer becomes effective, or a shorter time if agreed by the LNG Operator.

Legislative and regulatory barriers exist to implementation in Spain.

Existing SSO contracts are a barrier to implementation in France.



## 11 CBP 2009-001/01 Harmonisation Operating of Contracts

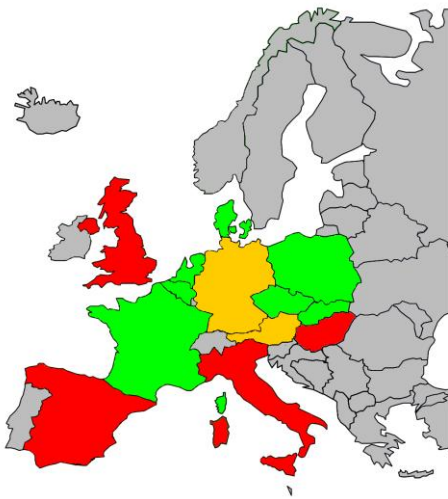
*This Common Business Practice describes a set of recommendations for the operating of most types of commercial contracts used in the European natural gas business among non-system operators. As supplements to this document and as integral parts of this Common Business Practice, documents to be used to create a standardized operating agreement are provided.*

*Implementation Date: October 2010*

### 11.1 General Comments for CBP 2009-001/01

One respondent noted that their company applies contracts with system users as defined in the TSC (Transmission Service Conditions), connected parties (like TSO's, SSO's and LNG operators) in the GCA (Grid Connection Agreements) and with direct attached customers in the SVO (Systeem VerbindingsOvereenkomst).

### 11.2 Minimum requirements set in CBP regarding operating aspects of new contracts



<u>Responses</u>	Milestone implemented	Milestone not implemented
Austria	1	1
Belgium	2	0
Czech Republic	1	0
Denmark	2	0
France	2	0
Germany	2	1
Hungary	0	1
Italy	0	1
Netherlands	4	0
Poland	1	0
Slovakia	2	0
Spain	0	2
United Kingdom	0	1

Most respondents (17 out of 24) stated that they implemented the set of recommendations for the operating of commercial contracts used among non-system operators, as described in the CBP.

One respondent noted that the operational aspects are usually part of a contract and negotiated and that very often the implementation of the respective CBP is therefore not possible.

**Annex 1**

<b>1</b>	CBP 2003-001/01	<b>Harmonisation of Units</b>	1-Nov-03	This Common Business Practice promotes the use of the same units for pressure, energy, volume and calorific value by all organisations involved in the delivery of gas from the producer to the client.
<b>2</b>	CBP 2003-002/02	<b>Harmonisation of the Nomination and Matching Process</b>	18-Feb-09	This CBP describes a first set of recommendations for the part of the process which relates specifically to transportation nominations and involves shippers and Infrastructure Operators. For reasons of consistency, it should also serve as the core for the communication processes between all other relevant parties involved in the gas chain.
<b>3</b>	CBP 2003-00/02	<b>EDIG@S</b>	7-Nov-07	This CBP describes the Edig@s versioning process and the use of the EDIG@S protocol for the exchange of sales, infrastructure and service business information between parties in the European gas market, s described in the Edig@s Message Implementation Guidelines (MIG)
<b>4</b>	CBP 2005-001/02	<b>Harmonisation of Gas Qualities</b>	6-Nov-08	This Common Business Practice (CBP) recommends natural gas quality specifications to streamline interoperability at cross border points in Europe and describes the recommended gas quality parameters, parameter ranges and the implementation plan.
<b>5</b>	CBP 2005-002/02	<b>Interconnection agreements</b>	18-Feb-09	This Common Business Practice describes the scope of an Interconnection Agreement to be established by two adjacent Infrastructure Operators, describing how to facilitate interoperability of the grids.
<b>6</b>	CBP 2005-003/01	<b>Constraints</b>	8-Sep-05	This Common Business Practice describes the operational procedures to be applied where constraints arise due to unforeseen restrictions in transmission capacity or due to off-specification gas properties.
<b>7</b>	CBP 2007-001/01	<b>Message Transmission Protocol</b>	18-Sep-07	This CBP proposes that the public internet is used as the data network for the transmission of EDIG@S Messages.
<b>8</b>	CBP 2007-002/01	<b>Common Data Communications Network</b>	18-Sep-07	This CBP proposes that Applicability Statement 2 (AS2) is used to transmit EDIG@S messages between organisations.

<b>9</b>	CBP 2007-003/01	<b>Company's Identifier encoding</b>	18-Sep-07	This CBP promotes the use of a specific encoding system for company identifiers in electronic messages, exchanged in gas transactions among gas market Players.
<b>10</b>	CBP 2007-004/01	<b>Connection Point Identifier encoding</b>	18-Sep-07	This CBP promotes the use of a specific encoding system for connection point identifiers in electronic messages, exchanged in gas transactions among gas market Players.
<b>11</b>	CBP 2007-005/01	<b>EDIG@S Release Periods</b>	7-Nov-07	This CBP describes the how EDIG@S releases shall be managed, functionally and technologically.
<b>12</b>	CBP 2007-006/01	<b>Harmonisation of the Allocation Information Exchange</b>	12-Dec-07	This CBP describes a first set of recommendations for the part of the business which relates specifically to crossborder transport allocations and involves TSOs and shippers.
<b>13</b>	CBP 2008-001/01	<b>Secondary Capacity Trading</b>	27-May-08	This CBP describes a set of recommendations for the trading of capacity rights, commonly known as secondary capacity trading, as described by article 8 of EC regulation 1775/2005 and involves TSOs and shippers.
<b>14</b>	CBP 2009-001/01	<b>Harmonisation of the operating of contracts</b>	18-Feb-09	This CBP describes a set of recommendations for the operating of most types of commercial contracts used in the European natural gas business among non-system operators. As supplements and integral parts of this CBP, documents to be used to create a standardized operating agreement are provided. This CBP is supplemental to and complies with existing CBPs dealing with operational issues (e.g. CBP 2003-002/02, CBP 2005-003/01, CBP 2007-006/01 and the Edigas related CBPs)