

Consultation document on Common principles for market information publication

In order to align the publication principles used in the Baltic-Finnish market area the Transmission system operators (TSOs) of the market area have developed a descriptive document to clarify, align and communicate the current principles used prior and when disclosing the infrastructure and service based transparency and inside information to the market participants. This document is intended as a set of guidelines to the market participants to elaborate the principles, timelines and methodologies used, as well as to explain the information already disclosed.

The aim of the Document is to consult information transparency principles which will be taken into account by TSOs as a best practice guideline.

The document sets out the principles for:

1. Publication of the market transparency and inside information
 - a. Defines the common publication locations and information available on each publication system.
2. Capacity calculation methodology coordination
 - a. Defines the main capacity calculation principles
 - b. Defines the main schedule for the calculation procedure
3. Capacity calculation and coordination timeframes
 - a. Defines the timeframes and coordination times of the capacity information, as well as the publication time of the coordinated capacity
4. Common view on the publication principles used in the REMIT ((EC) No 1227/2011) and Transparency reporting ((EC) No 715/2009)
 - a. Defines any other data or procedure used and data published, mainly:
 - i. Definitions used in the publications
 - ii. Publication of implicit capacity shares.
 - iii. Virtual capacity on the interconnection points
 - iv. Coordination of joint maintenance plans
 - b. The use of UMM and inside information disclosure

Publication of the market transparency and inside information

The Transmission System Operators of Finnish-Baltic region are harmonizing the market information publication principles. The harmonization principles concern both market relevant data publication (such as physical flows, nominations, capacities, gross calorific values (GCV)) and inside information data publication by Urgent Market Messages (UMMs).

Chapter 3 of Annex I of the Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005 sets the requirements (content, scope and format) for transparency information publication. The TSOs shall provide the required information in the following manner:

- a) on a website accessible to the public, free of charge and without any need to register or otherwise sign on with the TSO;
- b) on a regular/rolling basis; the frequency shall be according to the changes that take place and the duration of the service;
- c) in a user-friendly manner;
- d) in a clear, quantifiable, easily accessible way and on a non-discriminatory basis;
- e) in a downloadable format that has been agreed between transmission system operators and the national regulatory authorities;
- f) in consistent units, in particular kWh shall be the unit for energy content and m³ shall be the unit for volume;
- g) in the official language(s) of the Member State and in English.

TSOs are publishing the technical information necessary for network users to gain effective access to the system, the definition of all relevant points for transparency requirements and the information to be published at all relevant points are published on the Transparency Platform offered by ENTSOG and on individual TSOs webpage.

The information publication overview is provided in the Annex 1 of this procedure giving overview of all TSOs publication practices in single place.

Capacity calculation and publication

Capacity calculation methodology

According to Article 2(1)(18) of Regulation (EC) No 715/2009 the TSOs are offering maximum firm capacity which can be offered for market participants taking account of system integrity and the operational requirements of the transmission network. Each TSO's capacity calculation methodology is available under Annex 1 table reference 3.1.2 (m). TSOs are commonly calculating the technical capacity at the relevant points and values are coordinated based on "lesser-rule" principle and published taking into account the coordination timeframes and other principles described below.

Capacity will be published in accordance with the Regulation (EC) No 715/2009 definitions meaning:

'technical capacity' means the maximum firm capacity that the transmission system operator can offer to the network users, taking account of system integrity and the operational requirements of the transmission network

'available capacity' means the part of the technical capacity that is not allocated and is still available to the system at that moment

Capacity calculation and coordination timeframes

The Baltic-Finnish market area TSOs shall coordinate, calculate and publish technical capacity in the timeframes described in this section for all relevant points. Due to different characteristics of the relevant points, the capacity calculation and coordination timeframes are not fully harmonized. The current deadlines and principles are defined in existing agreements between the TSOs:

1. Interconnection agreement (Elering and Gasgrid)- Agreements governing the operational principles of Balticconnector interconnection point as well as the coordination principles between system operators.
2. Technical agreement (Elering and Conexus Baltic Grid) Agreement governing the technical principles for operation, data exchange and other related topics.
3. Interconnection agreement (Amber Grid and Conexus Baltic Grid) Agreements governing the operational principles of Kiemenai interconnection point as well as the coordination principles between system operators.

Based on the outcome of consultation the review of those agreements is foreseen to further align the publication of information and coordination procedures. The current practices defined in the existing agreements are as follows:

Common practices identified

Technical capacity will be published at least 10 years ahead and available capacity and booked capacity at least 24 months ahead, based on the available information at the time of publication. As the maintenance plan review period consists of outages up to year ahead, the capacity information for next gas years uses the normal operational capacity values (if there aren't any known limitations). The technical capacity value shall be reviewed periodically and updated if there is new information having impact on the technical capacity values. The technical capacity, available capacity and booked capacity are published on the ENTSOG Transparency Platform and on TSOs homepages. Exceptional event and interruptions limiting the capacity shall be published using UMM messages.

When coordinating the maintenance plans the principle that any planned maintenance works impacting the capacity shall not be planned at least 42 days before the delivery day. If there are maintenance works that can't be postponed unplanned maintenance can be published with shorter lead lime. Any type of outage is published according REMIT as soon as possible after the capacity calculation and coordination of outage is finalized. Information regarding place of publication is described in the section *Coordination of joint maintenance plans*.

Elering AS and Conexus Baltic Grid:

Capacity coordination and publication timelines in accordance with the framework agreement between Conexus and Elering states the following timeframes. Prior to capacity calculation the system operators coordinate the maintenance plans in order to align the maintenance plans. The coordinated maintenance plan is used for basis for the capacity calculation and coordination:

1. Year ahead – (booking window opens on 1st of July each year) – by 15th of June each year
2. Quarterly – (booking window opens 2 months before beginning of the quarter) by 15th of June, 15th of September, 15th of December and 15th of March
3. Month ahead – 15th of two months before;
4. Day ahead at 10:00 EE(S)T on D-1;
5. In case of exceptional change of capacity, as soon as possible;

Gasgrid Finland:

Gasgrid calculates the technical capacity by using SIMONE modeling software. Gasgrid applies hydraulic calculation model.

Balticconnector is the only interconnection point to/from Finnish gas network. Gasgrid coordinates the entry and exit technical capacity offered at Balticconnector with Estonian and Latvian TSOs. By coordinating the technical capacities, the purpose is to maximise the capacity which can be offered for the market participants. The technical capacities are not only impacted by characteristics of local transmission system, but the neighboring transmission systems may have a significant impact on the technical capacities. Gasgrid coordinates the technical capacity calculation results with Elering AS and Conexus Baltic Grid in order to align the capacity values so that it takes into account the capability to transport gas accordingly. The technical capacity of Balticconnector are published in the ENTSOG Transparency Platform.

At Balticconnector interconnection point, the capacity is coordinated and calculated according to the following schedule:

1. Year ahead capacity is coordinated and calculated by 15th of June each year.
2. Month ahead – 21st of previous month.
3. Day-ahead at D-1 by 17:00 EE(S)T
4. In case of exceptional change of capacity, as soon as possible after the capacity calculation and coordination of outage is finalized

Gasgrid Finland and Elering will evaluate the applicable coordination and calculation schedule at Balticconnector. The schedule may be amended if the TSOs find more efficient and appropriate schedule taking into account the coordinated maintenance plan.

The technical capacity of Imatra entry point is set to the value of 220 GWh/day, except during the periods of maintenance works affecting to the technical capacity. The technical capacity of Imatra entry point is published in the ENTSOG Transparency Platform.

At Finnish exit zone, biogas virtual entry point and LNG virtual entry point Gasgrid Finland does not publish technical capacity values, because Gasgrid Finland has evaluated that it is capable to transport and receive gas in its transmission system without limitations. This means shippers may book entry and/or exit capacity products without restrictions on these points.

Amber Grid:

At GIPL IP offered capacity will be published according to the requirement of CAM NC and network users will be notified according to the following schedule:

1. Capacity for yearly products - at least 1 month before the auction starts; Art. 11(8) (yearly capacity auctions shall start on the first Monday of July each year unless otherwise specified in the auction calendar; Art. 11(4));
2. Capacity for quarterly products – two weeks before the quarterly auctions start; Art. 12(6) (annual quarterly capacity auctions shall start on the following days, unless otherwise specified in the auction calendar: (a) on the first Monday of August; (b) on the first Monday of November; (c) on the first Monday of February; (d) on the first Monday of May; Art. 12(4));
3. Capacity for monthly products – one week before the auction starts; Art. 13(6) (auctions shall start on the third Monday of each month for the following monthly standard capacity product unless otherwise specified in the auction calendar; Art 13(4));
4. Capacity for day-ahead products – at the time the bidding round opens; Art. 14(8) (The bidding round shall open every day at 15.30 UTC (winter time) or 14.30 UTC (daylight saving); Art. 14(5));

5. Capacity for within-day products - after closure of the last day-ahead auction; Art. 15(9).

Other capacity related information and publication principles used in the REMIT and Transparency reporting

Publication of implicit capacity shares

Implicit capacity allocation via Trading platform is allocated for Balticconnector and Kiemenai interconnection points. The amount of capacity share given to Trading platform for allocation is agreed with adjacent system operators as set out in the network rules of the adjacent market areas.

In accordance with the network rules set out in the common balancing zone the TSOs publish the information related to implicit capacity share allocated via the trading platform shall be:

1. In Estonian and Latvian market area: “The amount of capacity given for implicit capacity allocation via trading platform(s) is determined based on historical data and on the principle of minimizing capacity shortage either for implicit capacity allocation via trading platform or for implicit capacity allocation via confirmed quantity. In case on previous day all capacity given to trading platform(s) was allocated, the trading platform(s) may request amount of capacity to be increased by five per cent. In case on previous day all capacity available for allocation by confirmed quantity was allocated and all capacity given to trading platform(s) was allocated, the amount of capacity given for trading platform(s) is reduced by five per cent.”. Any change of the implicit capacity share will be communicated in advance in accordance with market rules using the UMM message publication. 10% of capacity shares are used currently
2. In Finnish market area: Gasgrid Finland shall define the share of technical capacity to be offered via trading platform(s) (gas exchange) and the TSO’s platform (OTC). The amount of technical capacity given for implicit capacity allocation via trading platform(s) is set by Gasgrid. The rest of technical capacity given for implicit capacity allocation is set by Gasgrid for bilateral over-the-counter (OTC) trading. If the share of capacity offered for trading platform(s) will be changed, Gasgrid will announce about the change beforehand.
3. In Lithuanian market area: at least 80 percent of available day-ahead and within-day capacities at the entry/exit point of the interconnection of Lithuanian and Latvian gas transmission systems shall be allocated via implicit capacity allocation.

Interruption of the network service.

Elering/Conexus:

In case of exceptional incident in the transmission system where TSOs are forced to limit the technical capacity on entry/exit points the unplanned network service limitation can apply. According to the applied practiced in the event of such emergency incident, the TSO shall make reasonable efforts and take actions to ensure that continuity of the service is established without an undue delay with the aim to minimize the impact on network users.

Application of pro-rata principle and the reduction of amount invoiced means, that during the event of unplanned firm capacity curtailment, or interruption network user is invoiced only for the firm service ensured after application of pro-rata principle on the capacity booked by network user before announcement of curtailment. Details of the interruption procedure and invoicing are set in the network rules of the Common Balancing zone.

Gasgrid Finland:

If technical or operational matters result in temporarily restricted capacity in all or part of the transmission network, the TSO shall without delay notify all shippers and traders about reduced capacity. Having issued a reduced capacity notice, the TSO shall have the right to order shippers to reduce firm capacity reserved by them on pro rata basis or interrupt deliveries and offtakes in the gas system for as long as capacity is restricted in all or part of the transmission system. The shippers shall ensure from the transmission network end users that they comply with the order and, indirectly via their retailers, that the distribution network end users comply with the order.

The TSO shall distribute the part of the capacity available among the affected shippers and other participants as follows:

- a) Interruptible capacity shall be restricted before firm capacity. Deliveries to non-protected end user metering sites shall be restricted before deliveries to protected metering sites.
- b) Efforts shall be made to minimize impacts on consumers so that there will be no interruptions to the supply of gas.

The TSO shall compensate to shippers for restrictions on firm capacity products. If a shipper or its transmission network or distribution network end users do not comply with an order of the TSO to restrict or interrupt natural gas delivery or offtake, the shipper shall pay the excess capacity charge for natural gas quantities exceeding the order of the TSO.

Amber Grid:

In case of maintenance or exceptional incident in the transmission system where TSO is forced to limit the technical capacity on entry/exit points network service limitation can apply. TSO shall make reasonable efforts and take actions to ensure that continuity of the service is established without an undue delay with the aim to minimize the impact on network users.

In case of capacity restrictions, interruptible capacity of the shortest period shall be limited firstly, then interruptible capacity of a longer period and finally, if needed, firm capacity shall be limited. Details of the interruption procedure and invoicing are set in the network rules for access to the transmission system.

Virtual capacity on the entry-exit points

On Balticconnector and Incukalna UGS entry-exit points, the virtual capacity is offered in coordination with adjacent system operator taking into account possible physical limitations. Virtual capacity is offered based on day-ahead confirmed nominations. Physical and virtual limitations of specific points are listed below:

1. Balticconnector: Virtual capacity may be offered based on Virtual Reverse Flow at Balticconnector to increase Available Capacity. The virtual capacity is limited due to the possible changes in day-ahead nominations. The maximum offered virtual capacity per direction

is 46 000 kWh/h. If the amount of virtual capacity will be changed, Gasgrid will announce about the change beforehand.

2. Incukalns UGS entry – exit points has interruptible virtual counter-flow capacity up to the amount allocated in the direction of the actual technological regime (storage cycle season) of Incukalns UGS in accordance with the Regulations regarding the use of the Incukalns UGS.

Coordination of joint maintenance plans

The TSOs of Baltic-Finnish region have started the joint assessment of Regional Transmission System maintenance plans and Capability analysis in order to operate the gas systems on a regional level more efficiently. Transmission system operators publish annually, by 01.07, all planned maintenance periods that might affect network users' rights from transport contracts and corresponding operational information. The timeline for the action points of technical and operational co-operation are presented below.

TECHNICAL AND OPERATIONAL CO-OPERATION	Q1/21	Q2	Q3	Q4	Q1/22	Q2	Q3	Q4
Assessment of Regional Transmission System Capability with current setup and after ongoing infrastructure development projects	■							
Coordination of Joint Maintenance Plans		■				■		
COMMS: Regional Gas Market Council								
• Publication of Regional Transmission system capability assessment (~08)			◆				◆	
• Presentation and publication of PCI-project status and joint maintenance plans			◆				◆	

The coordination of the maintenance is led by Conexus Baltic Grid. The TSOs are collecting their national maintenance needs and their impact, after which the timing of maintenance will be coordinated commonly. The target is that the maintenance works will have as little impact for market participants as possible. Once the coordination of the TSOs is completed and final maintenance plans are confirmed, the information will be published to the market. During the maintenance period the review of the annual maintenance plan is done based on individual changes of the maintenances. TSO leading the maintenance work shall notify the adjacent TSOs of the change of timeline and possible impact on other outages involved in the maintenance plans. Any coordinated outage in the maintenance plan shall be communicated to the market after the coordination and calculation of capacity information is finalized.

Each TSO shall be responsible for the publication of their affected asset information together with impact of the capacity and shall use the publication locations set out in Annex 1 of this document, mainly TSOs website, respective UMMs and ENTSOG Transparency Platform the deadline set by the joint maintenance plan publication.

Coordination with third country TSOs

In the process of joint maintenance plan coordination, the TSOs also take into account the actual and available information on repair works in the Russian Federation by the time of common coordination. The TSOs of Finnish-Baltic region send the agreed work plans to the TSO of the Russian Federation once they are agreed amongst Baltic-Finnish TSOs.

The coordinated maintenance plans are exchanges with TSO of the Russian Federation in the annual maintenance plan coordination. As the conformation deadline set out by TSO of the Russian Federation is set based on current agreements (between Baltic TSOs and Gazprom) for 01.12 the maintenance plan coordinated and published by TSOs of Finnish-Baltic region will be updated taking into account the Russian system operator outages after the relevant coordination.

The use of UMM and inside information disclosure

TSOs shall publicly disclose in an effective and timely manner inside information which they possess in respect of business or facilities which the market participant concerned, or its parent undertaking or related undertaking, owns or controls or for whose operational matters that market participant or undertaking is responsible, either in whole or in part in accordance with the Regulation (EC) No 1227/2011.

Starting from 01.01.2021 all TSOs of Baltic-Finnish market area are publishing information in one common inside information reporting platform provided by GET Baltic. All TSOs information on their relevant interconnection points and impact on capacity information can be found in single place. TSOs are commonly coordinating the information published with adjacent system operators to assure the integrity of the information and to keep communication same for both area market participants.

The main information TSOs are publishing is related to the infrastructure unavailability where the gas capacities are affected due to respective event. This information is published using format “Unavailability of gas facilities” and gives information on the capacity available for technical use. Here it is important to note that available capacity in the UMM publication principle is used as technical capacity in the scope of Regulation (EC) No 715/2009 in order to indicate the maximum firm capacity that the transmission system operator can offer to the network users, taking account of system integrity and the operational requirements of the transmission network.

In addition to infrastructure unavailability TSOs are also publishing relevant market information using “Other market information messages”. For instance, but not limited to:

1. Expansion and dismantling of new infrastructure that causes change of technical capacity
2. Information about milestones of relevant infrastructure projects

TSOs consider, that “planned unavailability” means a programmed change in capacity, for instance, maintenance plan, whereas “unplanned unavailability” stands for a change in capacity due to, for instance, an outage or forced limitation of capacities. Planned interruptions are usually intentional and driven by the decision of TSOs, whereas unplanned events are not intentional and not related to TSOs decisions.

A separate criterion for the unplanned unavailability (instead of planned unavailability) is that if the relevant capacity unavailability information for the UMM becomes available and is published less than 42 calendar days prior to the commencement of the particular capacity interruption to which UMM applies, then UMM is considered unplanned and relevant message status is used.

Annex 1: Data publication overview.

Provided in separate document.