

Consultation paper
regarding draft interconnection agreement for
Connection Point Kiemenai

JSC “Conexus Baltic Grid” and AB Amber Grid (hereinafter – Conexus Baltic Grid and Amber Grid respectively) intend to conclude updated version of Interconnection agreement. According to art. 4 (2) of the Commission Regulation (EU) 2015/703 of 30 April 2015 establishing a network code on interoperability and data exchange rules, both TSO’s shall invite the network users to comment on the proposed text of:

- 1) rules for the matching process,
- 2) rules for the allocation of gas quantities,
- 3) communication procedures in case of exceptional events.

This consultation will run from **2nd January 2025 until 19th January 2025**. Conexus Baltic Grid and Amber Grid will evaluate the comments received during the consultation, and, if necessary, adjust the text of interconnection agreement.

Please submit your proposals and comments on the draft Amendments (in English) till January 19, 2025 by sending them (electronically) to the TSOs e-mail addresses: Conexus Baltic Grid (Aleksandrs.Lvovs@conexus.lv) and Amber Grid (consultation@ambergrid.lt).

Should you have any further questions please contact the respective representatives: Conexus Baltic Grid Business analyst of System control centre Mr. Aleksandrs Lvovs by e-mail Aleksandrs.Lvovs@conexus.lv or AB Amber Grid Head of Customer support Mrs. Deimantė Bareikienė by email d.bareikiene@ambergid.lt

Below you can find the content of interconnection agreement in the wording in which the TSO’s intend to conclude the interconnection agreement with regard to the abovementioned rules:

6. RULES FOR THE MATCHING PROCESS

- 6.1. The purpose of the matching process is to have identical confirmed quantities for each of network users at both sides of Kiemenai IP when processed quantities are not aligned.
- 6.2. The matching rule shall be a lesser rule unless TSOs have agreed to implement other matching rule.
- 6.3. Initiating TSO shall be “Amber Grid” and matching TSO shall be ”Conexus Baltic Grid”.
- 6.4. TSOs undertake to exchange information on transmission regimes for planning purposes about anticipated gas flows at Kiemenai IP for the next month and actual month as soon as such information is received by each TSO.
- 6.5. The matching process shall start at 15.00 EET (EEST) on D-1.

6.6. TSOs shall send initial confirmed quantities of gas to network users no later than 17.00 EET (EEST) on D-1.

6.7. Detailed description of the nominations and re-nominations matching process as well as the division of responsibilities and timeframes is described in Annex 3.

6.8. After the D-1 nominations are approved by TSOs these nominations become binding for TSOs in the range of firm capacity. In case TSOs are not able to organize physical flow based on these nominations through Kiemenai IP due to unexpected or exceptional events, it is the responsibility of TSOs in cooperation to solve the situation by keeping providing the commercial flow, except in the emergency situations described in the national legislation.

6.9. In terms of the matching process, data exchange between TSOs shall be conducted electronically and with agreed data formats unless agreed otherwise by both TSOs. The data exchange process is described in Annex 3.

6.10. When processing nominations, the TSOs shall calculate gas flow on a consistent basis at both sides of Kiemenai IP, taking into account any temporary reduction of capacity due to any of the conditions referred to in point 3.13 of the Agreement on one or both sides of Kiemenai IP.

6.11. The TSOs agree the following time schedule in order to complete the matching process, taking into account the data that needs to be exchanged, and all calculation and communication steps required to inform network users in an accurate and timely manner. The duration of each process is specified from the starting point of the nomination or re-nomination cycle:

6.12. Calculating and sending of processed quantities of gas by the initiating TSO: within 45 (forty-five) minutes.

6.13. Calculating and sending of confirmed quantities of gas by the matching TSO: within 90 (ninety) minutes.

6.14. Sending confirmed quantities of gas to network users and scheduling the gas flow across the Kiemenai IP: within 2 hours.

9. RULES FOR THE ALLOCATION OF GAS QUANTITIES

9.1. The TSOs shall ensure the consistency between the allocated quantities at both sides of Kiemenai IP:

9.2. gas quantity allocated to network user for a specific day shall be equal to the gas quantity according to nominations confirmed by the TSOs for the network user.

9.3. difference between confirmed nominations for network users and measured gas quantity (steering difference) shall be allocated to the OBA administered by both TSOs.

9.4. The TSOs shall endeavor to maintain OBA balance that is as close to zero as possible during the agreed period and depending on operational regimes agreed by TSOs and taking into account the provisions of point 3.7.3.

9.5. The decisions regarding the gas flows at Kiemenai IP, which has a potential to affect the OBA, shall be agreed by TSOs.

9.6. TSOs agree on daily limits of the OBA. The daily accumulated OBA for direction from “Amber Grid” to “Conexus Baltic Grid” at Kiemenai IP shall not exceed 20 GWh and for

direction from “Conexus Baltic Grid” to “Amber Grid” shall not exceed 20 GWh. At the end of the month OBA shall not exceed 2 GWh. The limits of OBA described in this section cannot be exceeded unless otherwise agreed between the TSOs in writing (e.g. in cases when reduction of OBA would cause uneconomical operation of transmission system (the need of additional operation of equipment which is not related to gas market nominations) or when during the next calendar month there is expected change of gas flow direction which will reduce accumulated OBA) or due to exceptional events or emergency situations described in point 6.8 of the Agreement.

9.7. Where the defined limits of the OBA are reached, the TSOs may agree to extend those limits in order to provide allocations to network users that are equal to their confirmed quantities or otherwise allocate quantities to network users proportionally based on the measured quantity.

9.8. The TSOs shall allow the netting of gas flows. Main principles of netting gas flows:

9.9. commercial flows in gas system are allowed for all interconnection points.

9.10. net flow is the actual physical flow resulting from the netting of the commercial flows.

9.11. no cross-border imbalance will normally occur for commercial gas flow.

9.12. differences between actual physical gas flow and net flow shall be allocated to the OBA, which shall not exceed 2GWh at the end of the month.

9.13. commercial flow can be restricted due to the technical or operational limitations of the gas system.

9.14. TSO starting transit procedure with customs, must inform other TSO about this procedure and the gas quantity undergoing this procedure until 10th date of month after fulfilling such flow with transit procedure.

9.15. In case if regional agreement on provisions relating to the subject matter of OBA among the Parties and other system operators exists, regional agreement shall govern the OBA limits during month and at the end of the month. This section 9 of Agreement prevails over regional agreement for only those provisions which by their nature are bilateral and shall be governed by this bilateral Agreement between the Parties even during validity of regional agreement.

10. COMMUNICATION PROCEDURES IN CASE OF EXCEPTIONAL EVENTS

10.1. TSOs shall ensure that communication procedures, which facilitate fast and simultaneous communication in cases of exceptional events, are in place.

10.2. Communication between the TSOs shall be performed by means of oral communication, followed by an electronic written confirmation unless agreed otherwise.

10.3. The TSO affected by an exceptional event shall be required, as a minimum, to inform its network users with respect to point 10.3.2 and 10.3.3 of this section if there is a potential impact on their confirmed quantities and the adjacent TSO with respect to point 10.3.1 and 10.3.3 of this section of the occurrence of such exceptional event and to provide all necessary information about:

10.3.1. the possible impact on the quantities and quality of gas that can be transported through Kiemenai IP.

10.3.2. the possible impact on the confirmed quantities for network users active at Kiemenai IP.

10.3.3. the expected and actual end of the exceptional event.

10.4. In case there is mismatching between the data received by the TSO from the network user (for example, nominations), the TSO may make changes to the data using the following principles:

10.5. TSO persons responsible for allocations, as foreseen in this Agreement, must inform each other electronically about the data mismatching.

10.6. If it is necessary to make changes to the data, the TSO on whose side the data discrepancy was discovered must electronically notify the other TSO within two working days, indicating the point and direction of the data mismatching, the date, the quantity, the reason, and the affected network user. If other TSO is not responding within two working days, changes can be made without coordination with other TSO (until agreement on correct data is reached), to harmonise the data and informing other TSO on the changes made.

10.7. The TSO must make the changes within two working days of receiving the notification about the need for data correction.

10.8. The TSO must inform each other immediately after making the data changes.