

Public Consultation Report on the Amendment of the Business Requirement Specification for the Nomination and Matching Procedures at Interconnection Points

Please note: this report covers ENTSG's analysis of responses. The opinions expressed in this document are those of respondents to the Amendment of BRS for Nomination and Matching Procedures at Interconnection Points of consultation and not those of ENTSG.

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A. Introduction

This document serves as a 'Public Consultation Report' for the public consultation on the Amendment Draft of Business Requirement Specification on the Nomination and Matching Processes (BRS) that was conducted by ENTSG from 02 March to 31 March 2015.

Its objective is to give a summary of the responses that were received from stakeholders participating in the consultation and to assess and argue whether or not changes to the BRS Amendment based on stakeholder feedback are legitimate. ENTSG is therefore giving a response to all remarks and suggestions that were made by stakeholders in the context of the consultation.

The BRS is reflecting the business needs for structuring the nomination and matching process at interconnection points (IP) based on the frameworks defined in the Network Codes. It is part of a Common Network Operation Tool (CNOT) and is to be supplemented by a technical Message Implementation Guideline (MIG), providing the data to be used in this process.

The respective framework of the BRS is defined in the following Network Codes:

- 1) Commission Regulation (EU) No 312/2014 of 26 March 2014 establishing a Network Code on Gas Balancing of Transmission Networks (NC BAL) is providing general provisions on the nomination process. It defines minimum requirements of nomination messages and applicable deadlines for the submission of these;
- 2) Commission Regulation (EU) 984/2013 of 14 October 2013 establishing a Network Code on Capacity Allocation Mechanisms in Gas Transmission Systems (NC CAM) is providing an obligation for transmission system operators to allow one single nomination procedure for bundled capacity products;
- 3) The Draft Network Code on Interoperability and Data Exchange, currently undergoing comitology procedure, is defining the general requirements of the matching process between transmission system operators at interconnection points.

The Amendment Draft of the BRS was developed by ENTSG based on the framework provided by these Network Codes and includes further specifications that are regarded as necessary from an operational perspective of the transmission system operators.

In order to ensure that the BRS Amendment for NOM & Matching contains not only a sufficient enumeration of all relevant processes deriving from the Commission Regulation (EU) No 312/2014 (NC BAL), (EU) No 984/2013 (CAM Network Code) and the Draft Network Code on Interoperability and Data Exchange, but also a fully description of the detailed message requirements for developing the following Message Implementation Guideline based on the BRS, the market was asked to provide their opinion on the document during the aforementioned public consultation.

The public consultation was accompanied by a Stakeholder Workshop on the BRS, which was held on 16 March 2015.

This report sets out an abstract of the stakeholder responses. It intends to provide a conclusion of the opinions submitted in the consultation responses. Within ENTSG, the report will form an input

to the discussions for an amendment of the BRS for NOM& Matching before handing the document over to EASEE-gas in order to start the development of the Message Implementation Guideline.

This analysis report first sets out how ENTSG carried out the analysis of consultation responses, and gives an overview of the number and type of responses received. Section D of this document then examines each of the key themes covered by the consultation:

- Scope of the BRS document
- Use cases described in the BRS
- Business Requirements for the use cases
- Other issues.



B. Methodology

The presentation of consultation responses is performed in three stages:

- 1. Statistical analysis: provides statistical evaluations of the responses.*
- 2. Content analysis: the second section provides a more detailed summary of positions mentioned in the responses. It includes arguments brought up in the consultation and states the respective party or parties mentioning it.*

Please note: *In this section, equal or similar responses to questions of different respondents were grouped according to ENTSG's understanding of the arguments mentioned in the individual responses. For specific positions of individual respondents, interested readers are asked to use the document providing all consultation responses published on the ENTSG website as mentioned above.*

- 3. Conclusion: the third section is a summary of the ENTSG understanding of the market position, taking into account the statistical positions of the respondents and the arguments mentioned.*

All responses were treated equally regardless of the type, nationality, size or any other characteristic of the respondent.

When reading this report, it is important to take the following points into account:

- The numbers in favour of or against a particular position should not be taken as a definitive guide to the market's opinion. For example, a number of respondents may have decided to submit their views collectively via an association rather than responding individually.*
- Similarly, the number or strength of arguments put forward may not on its own provide an accurate guide to the views of the market. Those who do not support the option presented in the BRS as the preferred way forward may be more likely to present strong arguments than those who do.*

C. Overview of consultation responses

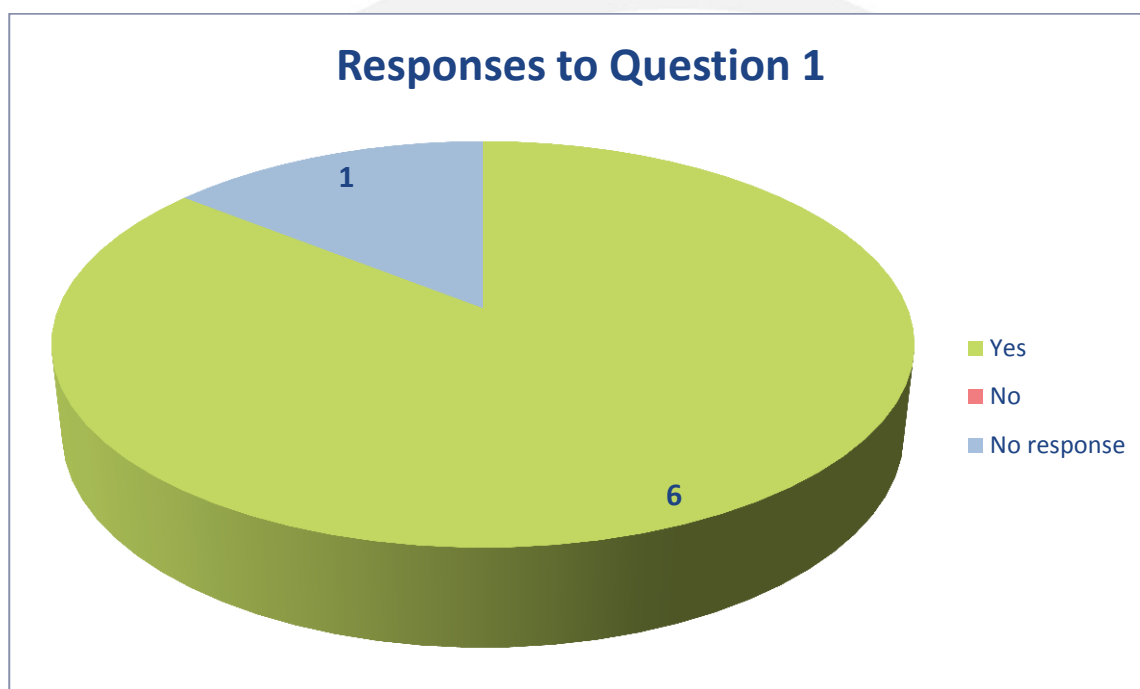
Table 1: Type of respondents

Overall responses received	number	7
European associations	1	- EASEE-gas
National associations	0	
Network Users	5	- EDF Trading Ltd (EDF) - Edison SpA - RWE Supply & Trading GmbH (RWE S&T) - VNG - Verbundnetz Gas AG - Statkraft Markets GmbH
Infrastructure operators	1	- Magyar Gáz Tranzit Zrt. (Gaz Tranzit)

D. Themes

Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?

Statistical analysis:



Yes	No	No Response
6	0	1

Content analysis:

- No consultation respondent disagrees to the amendments made to the BRS by ENTSG. EASEE-Gas noted that the foreseen use of the nomination flag in addition to the authorisation process is not completely in line with proposal made by EASEE-gas in the CBP and requests ENTSG to reconsider an implementation of the authorisation process without the nomination type flag. EDF Trading welcomes the clarity provided by the definition of 'initiating TSO' and 'matching TSO'. Edison agrees with the set of messages for data exchange and the whole process described in the document.
- Magyar Gáz Tranzit raises a few general remarks and questions to the BRS. Firstly, clarification is requested for liabilities in case of interruptions if single sided nominations are used. Secondly, clarification is requested on how nominations requests can contain a mix of both, single sided and double sided nominations (as foreseen in the BRS).

Conclusion:

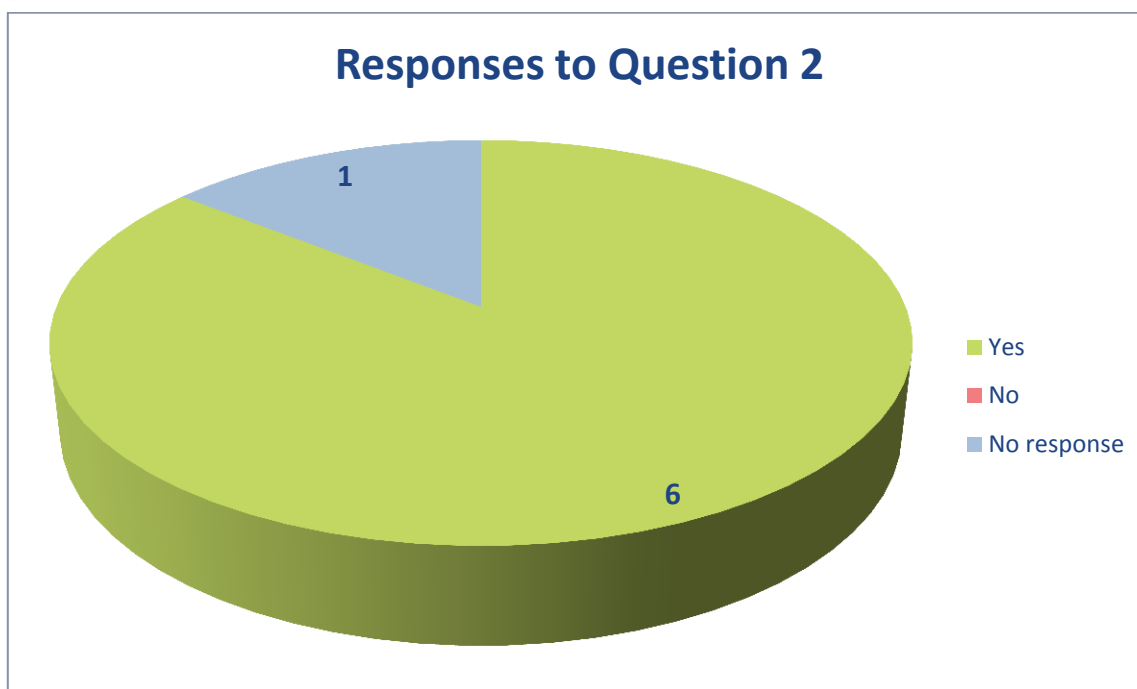
ENTSOG appreciates the clear support of stakeholders to the amendments made to the BRS. Regarding the request of EASEE-Gas to reconsider the necessity of the nomination type flag in the nomination, ENTSOG notes that some TSOs have indicated a clear necessity for such information in the nomination process. The nomination type flag tells TSOs which nominations are meant to be single sided and should therefore be forwarded to the adjacent TSO. Without this information, all received nominations would need to be forwarded for the adjacent TSO to check whether an authorisation is in place and therefore the nomination can be processed as single sided. ENTSOG is of the opinion that the nomination type flag can be helpful and does not impose a burden to the authorisation process and thus should be included in the nomination.

Regarding the clarification questions of Magyar Gáz Tranzit, ENTSOG wants to highlight that the BRS foresees that an interruption notice is in all cases to be sent by the interrupting TSO to its respective network user. This means that also in case of single sided nominations, the communication on potential interruptions takes place only between the respective parties of the capacity contract. Secondly, a nomination request refers to an information flow from a network user to a TSO which contains at least one nomination. A single nomination within a nomination request refers to a specific account pair, an IP and a flow direction. Thus several nominations (single sided and double sided) can be submitted to the TSO within one nomination request in case both processes, single-sided and double-sided, are implemented. The concrete functioning is further described in the Message Implementation Guidelines.

The BRS has been amended slightly to clarify the two points raised by Magyar Gáz Tranzit.

Question 2: Do you agree in particular with foreseeing an authorisation process for single sided nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?

Statistical analysis:



Yes	No	No Response
6	0	1

Content analysis:

- No consultation respondent disagrees to the foreseen authorisation process for single sided nominations and most respondents indicate support for the procedure.
- Remarks raised by consultation respondents mainly refer to the different mechanisms to potentially be used in the authorisation process. RWE S&T stresses that EDI communication is an administrative burden prefers an easier procedure such as email registration or an addendum to the contract. EASEE-Gas highlights the necessity of the authorisation process and proposes the use of a Joint Nomination Declaration message as set out in the EASEE-Gas CBP. Finally, VNG stresses that different mechanisms at different IPs could lead to a lot of implementation work for network users active in several markets.
- Magyar Gáz Tranzit stresses that it should be very clear who is initiating the nomination and whether single-sided nominations can be submitted to both TSOs.

Conclusion:

ENTSOG is thankful for the wide support of stakeholders for the authorisation process for single sided nominations. Regarding the different mechanisms potentially to be used in such an authorisation process, ENTSOG is of the opinion that such different options are necessary and efficient. This is due to the fact that, depending on the e.g. the number of IPs of a TSO and the number of customers, different TSOs will have different requirements to such a process. For TSOs with only a few IPs and a few customers, an edig@s-based communication system for an authorisation might be over-dimensioned and inefficient while for a TSO with many IPs and many customers, a manual process might be too complex. Furthermore, the authorisation process is a communication process solely

between a TSO and its network user, thus no cross-border communication and alignment is required. ENTSOG understands that network users active in several systems might face different mechanisms at different IPs, however ENTSOG still believes that this downside outweighs the potential costs of a complex standardised process for all TSOs.

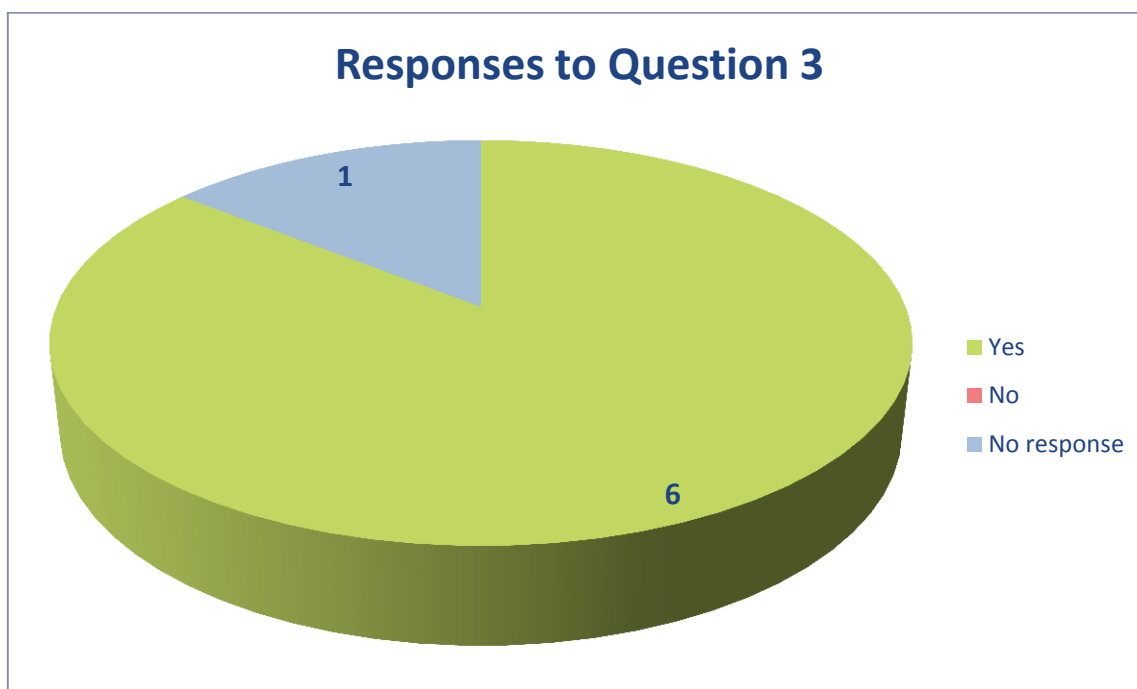
In the case of the single sided procedure, the BRS clearly provides that TSOs agree on which party is dedicated to receive single sided nominations and furthermore to make this public to network users.

Question 3: Do you agree with the foreseen default for the handling of double-sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS.

(Point 3.3.3.3 of the BRS: “For cases in which a single sided nomination is submitted on behalf of one legal entity active in both networks, the authorisation process may not be necessary, if the involved Transmission System Operators conclude a bilateral agreement allowing them to check the identities of nominating Registered Network Users. If in such a case the Registered Network User that submitted a single sided nomination to the active Transmission System Operator is also submitting a corresponding counter nomination to the passive Transmission System Operator, the nominations shall be processed as double sided nominations, unless specified otherwise by the Transmission System Operators.

If a passive Registered Network User submits a nomination to the passive Transmission System Operator affecting an account or portfolio code of the active Registered Network User for a period for which a valid authorisation between the two Registered Network Users is in place, the nomination shall be processed as double sided and the respective authorisation shall be deactivated

Statistical analysis:



Yes	No	No Response
6	0	1

Content analysis:

- RWE S&T, EASEE-Gas, VNG and EDF Trading mention their support for the proposed default rule in case a double sided nomination is submitted to match a single sided nomination at the other side of an IP. Most stakeholders are in favour of having such a 'fall-back' possibility to potentially intervene in the matching process.
- VNG raises the question whether additional information is provided to the network users in case the default rule comes into effect.
- EDF Trading stresses that it does not see much value in waiving the authorisation requirement if the same shipper is active on both sides of an IP.
- Magyar Gáz Tranzit agrees that the authorisation process isn't necessary in case one legal entity is involved on both sides. It stresses furthermore that the valid authorisation process should also be applied for double side nominations if the TSOs agree.

Conclusion:

Given the clear support of stakeholders to the default rule, ENTSG will keep the proposed procedure in the BRS.

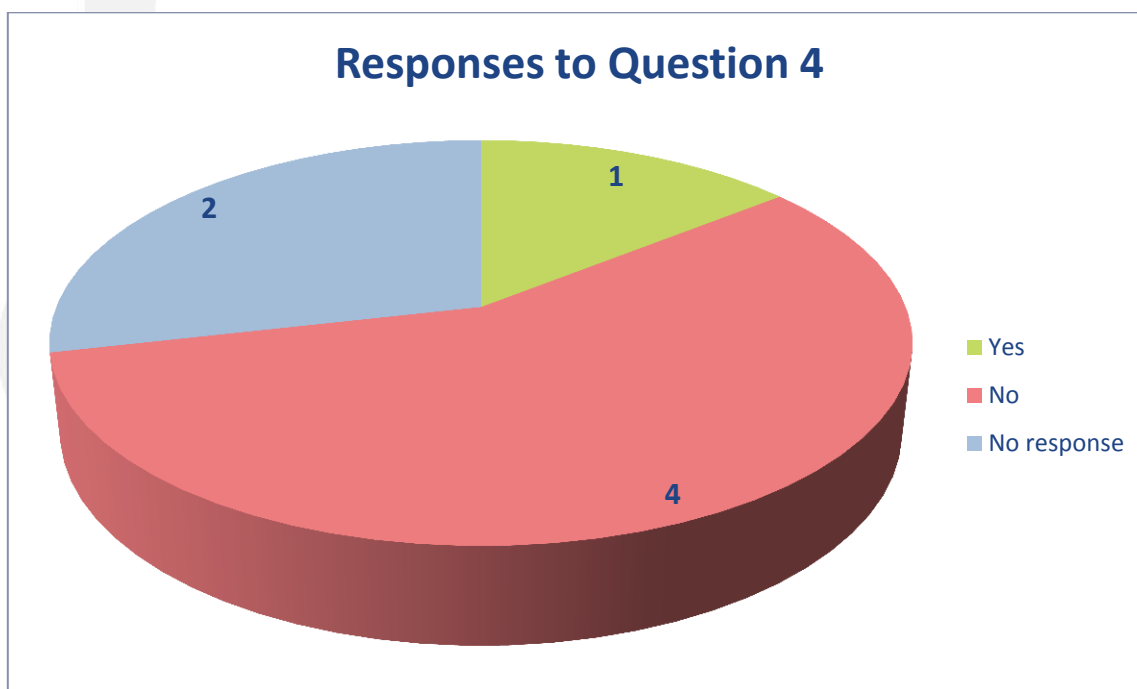
Regarding the information to be provided in case the default rule comes into effect, ENTSG is of the opinion that the information provided in the Registered Network User confirmation information flow (NOMRES) is sufficient as it contains all relevant matching data. Network users will be able to retrieve the information on how the confirmed quantities have resulted from this message. An additional message would only increase the data flow and would not provide additional information.

Regarding the authorisation process also in case the same shipper is active on both sides of an IP, ENTSGO believes that there are efficiency gains if the additional information requirements of the authorisation process are avoided where they are not necessary. In cases where the same legal entity is active on both sides, an authorisation would not provide any additional benefits. Nonetheless, TSOs can decide to make use of the authorisation process also in such cases if it is regarded as beneficial in specific circumstances.

Regarding the proposal to foresee an authorisation process also for double sided nominations, ENTSGO does not believe that such a procedure would increase efficiency in the process. Furthermore, no added value is seen as both network users provide the relevant data for the matching process and thus no authorisation from one of the parties to another is needed.

Question 4: Do you intend in future to make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?

Statistical analysis:



Yes	No	No Response
1	4	2

Content analysis:

- Out of the group of respondents, all but one of the network users indicate that they will probably not make use of the single sided nominations in the future. The main arguments

raised for not planning to make use of it is the implementation work and the risks associated with single sided nominations.

- EASEE-Gas as an organisation with members of different segments did not respond.
- Magyar Gáz Tranzit intends to make use of single sided nominations for the nominations of bundled capacity subject to the agreement with the adjacent Transmission System Operators IT infrastructure developments.

Conclusion:

ENTSOG concludes from the responses of stakeholders that the demand for the use of single-sided nominations by network users is for the time being rather low. The objective of the BRS is however to provide the tools for both possible processes, single-sided and double-sided nomination procedures. For this reason the indication of most stakeholders that they will most likely not request the use of single-sided nominations will not lead to any changes in the BRS.

Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.

Content analysis:

- Magyar Gáz Tranzit Zrt.: "The modified BRS is very clear in matching information flow, and we agree with the "lesser rule" as a basic rules applied in case of any differences in the matching process. We think that the double-sided nominations should be maintained until system users have unbundled capacities and according to the TSO's agreements. CMP rules and the interruptible capacity products and non-interruptible capacity products rules should be harmonized between the adjacent TSOs."
- VNG-Verbundnetz Gas AG: "1. Regarding the pre-nomination workflow - there is only one page that describes it - page 15, but it's missing in the other figures. Has this been done intentionally or by mistake? Anyway, VNG will use the pre-nomination process. 2. VNG would like to welcome a general reduction of the nomination lead time to 1 hour - could also be a goal in the future. 3. As a shipper / network user it is very welcome to have the choice of double sided vs. single sided nomination. 4. Will there be a list for each connection point that determines "active and passive TSO" or is this to be asked bilaterally when implementing the communication with the TSO?"

Conclusion:

ENTSOG welcomes additional ideas of stakeholders to improve the BRS and processes set out in it.

Regarding the points stressed by Magyar Gáz Tranzit, ENTSOG however is of the opinion that they are out of scope of the discussion on this BRS. Remarks to CMP mechanisms and capacity products should be placed in the respective responsible work stream of ENTSOG.

Regarding the points stressed by VNG:

(1) The pre-nomination process is set out in Article 14(4) of BAL NC as an optional procedure that can be offered by the TSO and therefore making use of it is not up to a single network user. As an optionality, the pre-nomination process is not a required part of the nomination and matching process in general. It has however been included in the workflow diagrams to illustrate the full picture of all possible data flows.

(2) The nomination lead-time of 2 hours is set out in the BAL NC and therefore included in the BRS. Potential future changes of the relevant legal requirements would of course result in a change of the BRS processes.

(3) ENTSOG agrees that the choice on whether a single sided nomination or a double sided nomination is used is up to the network users, as far as this choice is not limited by legal requirements and as far as both processes are offered for the respective capacity product.

(4) Due to the fact that multiple different constellations of roles are possible (e.g. depending on flow direction or a specific customer), ENTSOG does not intend to provide and constantly update a list of these roles. The specific role allocation will nonetheless be transparent to the network user and furthermore, communication tests with network users will still be conducted, so ENTSOG does not believe that any uncertainty on roles in the nomination process should occur.

E. Process following the public consultation

ENTSOG appreciates the involvement of stakeholders by responding to the public consultation of the BRS.

As explained in the introduction part of this report, the objective of this document is to summarise the arguments provided by the consultation respondents and to reflect the positions on the described processes in the BRS as understood by ENTSOG. It contains no commitment from ENTSOG on how the consultation responses will affect the BRS for Nom& Matching or the Common Network Operation Tools for Nom& Matching, consisting of the BRS and the Message Implementation Guideline (MIG).

Nonetheless, ENTSOG will certainly take into account all responses and check if an amendment of the BRS document is necessary before handing it over to EASEE-gas for the potential amendment of the MIG. The delivery of the BRS to EASEE-gas is planned for the beginning of May 2015. EASEE-gas will then conduct the MIG amendment until the end of June 2015. The publication of the revised Common Network Operation Tools for Nom& Matching by ENTSOG is scheduled for September 2015.

For additional information on the next steps and timeline, please review the timeline provided in the Stakeholder Workshop's presentation for BRS for Nom& Matching published on the ENTSOG website [here](#).



Annex I

Responses of consultation participants

1	RWE Supply & Trading GmbH
Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?	
Answer of respondent:	Yes
Question 2: Do you agree in particular with foreseeing an authorisation process for single sides nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?	
Answer of respondent:	Yes
<i>However, executing the authorization process via EDI communication is an administrative burden involving overhead costs and we question whether this is necessary if there is limited take up of single sided nominations. An easier procedure, like email registration or an addendum to the contract, should be considered.</i>	
Question 3: Do you agree with the foreseen default for the handling of double sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS?	
Answer of respondent:	Yes
<i>Passive shippers need to have a fall-back in case of mismatch so as to have the possibility of influencing the nomination and matching process if necessary.</i>	
Question 4: Do you intend to in future make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?	
Answer of respondent:	No
<i>We do not intend to use the single sided nominations because we don't see a business value at this stage. Any possible benefit would in no way outweigh the resources and costs involved in adapting our IT systems to accommodate single sided nominations.. We always need to be capable of checking our net positions in all market areas at any time and using single sided nominations would mean higher risks for our business. Single sided nominations would mean we would need to implement workarounds to simulate matching when we receive confirmations but haven't sent out nominations. Furthermore we would need to improve our systems to generate single and double sided nominations and to improve the matching procedures with new complex matching rules. We</i>	

estimate it would take around 2-3 month to adapt our systems for single sided nominations.

Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.

Answer of respondent:

No

2

EASEE-gas

Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?

Answer of respondent:

Yes

EASEE-Gas welcomes the amendments made in the BRS, since the draft CBP developed by EASEE-gas and the draft BRS developed by ENTSG are almost in line. However, EASEE-gas has found that the use of the authorisation process together with the nomination type (flag solution under the CBP) as proposed within the BRS is not completely in line with EASEE-gas' proposal. EASEE-gas would appreciate if ENTSG's members could evaluate the implementation of the authorisation process without using the nomination type.

Question 2: Do you agree in particular with foreseeing an authorisation process for single sides nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?

Answer of respondent:

Yes

In the case that two legal entities are involved in the single sided nomination process, EASEE-gas has found necessary the use of the authorisation process (Joint Nomination Declaration under the draft CBP) in order to protect both operators and shippers (especially the passive shipper).

Question 3: Do you agree with the foreseen default for the handling of double sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS?

Answer of respondent:

Yes

EASEE-gas supports the inclusion of this default rule. EASEE-gas believes that the processes at European level shall be harmonised as much as possible.

Question 4: Do you intend to in future make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?

Answer of respondent:	No response
<i>EASEE-gas is an organisation with members of different segments. Our members will possibly provide individual answers to ENTSG.</i>	
Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.	
Answer of respondent:	No

3	Magyar Gáz Tranzit Zrt.
Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?	
Answer of respondent:	Yes
<i>The modified BRS for nomination and matching clarify the process of the single sided nominations. The single side nominations are very useful if the same network user nominate for the both side of the interconnector point. It is very important the authorisation process between TSOs. In case of interruptions it isn't clear who can interrupt the Shippers, who is informing. In case of any legal dispute it isn't clear who is liable for the interruptions. But it isn't clear for me how can be the nomination request is mix of both single sided and double sided nominations which made by a Registered Network User to the active Transmission System Operator (rows 207, 208).</i>	
Question 2: Do you agree in particular with foreseeing an authorisation process for single sides nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?	
Answer of respondent:	Yes
<i>Yes I agree with the authorisation process for single sides nomination. It should be very clear who initiating the nomination and whether single-sided nominations can be submitted to both side of the TSOs.</i>	
Question 3: Do you agree with the foreseen default for the handling of double sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS?	
Answer of respondent:	Yes
<i>I agree with that the authorisation process isn't necessary in case of the single sided nomination is</i>	

submitted on behalf of one network user actives on both side of the networks and TSOs conclude a bilateral agreement about allowing them to check the registered network users. But if the TSOs don't conclude an agreement the valid authorisation process should be applied for double side nominations.

Question 4: Do you intend to in future make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?

Answer of respondent:

Yes

Yes we intend to use the single-sided nominations for the nominations of bundled capacity if we will agree with the adjacent Transmission System Operators and it requirers IT infrastructure development.

Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.

Answer of respondent:

Yes

The modified BRS is very clear in matching information flow, and we agree with the "lesser rule" as a basic rules applied in case of any differences in the matching process. We think that the double-sided nominations should be maintained untill system users have unbundled capacities and according to the TSO's agreements. CMP rulles amd the interruptible capacity products and non-interruptible capacity products rules should be harmonized between the adjacent TSOs.

4	VNG - Verbundnetz Gas AG
Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?	
Answer of respondent:	Yes
Question 2: Do you agree in particular with foreseeing an authorisation process for single sides nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?	
Answer of respondent:	Yes
<i>An authorisation process is generally a good idea. But the BRS describes many different ways of authorisation. This could be a lot of implementation, if you act in different markets like VNG as a shipper does. Also for TSOs that act at border points to other countries might have to implement different ways, e.g. Edigas, business portal and amendments.</i>	

Question 3: Do you agree with the foreseen default for the handling of double sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS?	
Answer of respondent:	Yes
<i>The possible "return" to double sided nomination due to errors or operational requirements is acceptable. If there is a switch back from single to double sided - will there be an additional information or will the switch be just shown in the NOMRES format?</i>	
Question 4: Do you intend to in future make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?	
Answer of respondent:	No
<i>We will not use the single-sided nomination in the near future, because the implementation costs and the possible risks in this process outweigh the possible benefit.</i>	
Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.	
Answer of respondent:	Yes
<i>1. Regarding the pre-nomination workflow - there is only one page that describes it - page 15, but it's missing in the other figures. Has this been done intentionally or by mistake? Anyway, VNG will use the pre-nomination process. 2. VNG would like to welcome a general reduction of the nomination lead time to 1 hour - could also be a goal in the future. 3. As a shipper / network user it is very welcome to have the choice of double sided vs. single sided nomination. 4. Will there be a list for each connection point that determines "active and passive TSO" or is this to be asked bilaterally when implementing the communication with the TSO?</i>	

5	EDF Trading Ltd
Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?	
Answer of respondent:	Yes
<i>We welcome the clarity provided by the definition of 'initiating TSO' and 'matching TSO'.</i>	
Question 2: Do you agree in particular with foreseeing an authorisation process for single sides nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?	

Answer of respondent:	Yes
Question 3: Do you agree with the foreseen default for the handling of double sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS?	
Answer of respondent:	Yes
<i>We do not see much value in waiving the authorisation requirement in the case the same shipper is active on both sides of an IP. We agree with the conditions and process to deactivate an authorisation for single-sided nominations.</i>	
Question 4: Do you intend to in future make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?	
Answer of respondent:	No
<i>We do not intend to make use of single-sided nomination for unbundled capacity. We are likely to use single-sided nominations only when mandatory.</i>	
Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.	
Answer of respondent:	No

6	Statkraft Markets GmbH
Question 1: Do you agree with the amendments made to the initial BRS for nomination and matching procedures?	
Answer of respondent:	Yes
Question 2: Do you agree in particular with foreseeing an authorisation process for single sides nomination, as a mechanism to avoid illegitimate single sided nominations of a network user impacting another network user's portfolio?	
Answer of respondent:	Yes

Question 3: Do you agree with the foreseen default for the handling of double sided nominations in case a valid authorisation is in place or in case of one legal entity active in both systems as defined in point 3.3.3.3 of the BRS?	
Answer of respondent:	Yes
Question 4: Do you intend to in future make use of single-sided nominations instead of double-sided nominations and how much time after publication of the relevant data formats do you need for the implementation in your IT-Systems?	
Answer of respondent:	No
Question 5: Do you have any other comments or suggested improvements to the BRS for nominations and matching procedures? If yes, please provide them here.	
Answer of respondent:	No

7	Edison SpA
<i>Edison welcomes the chance given to stakeholders to actively participate to this consultation process. In particular, we have appreciated the efforts made to explain clearly the details of the process relative to the BRS supporting the implementation of the mechanisms related to the CAM NC & CMP Guidelines, also arranging a specific workshop that we attended.</i> <i>Edison has analyzed carefully the consultation on BRS and, as a result, any specific/crucial points have been spotted so far. We basically agree with the set of messages for data exchange and the whole process described in the document.</i>	