

Consultation paper regarding draft interconnection agreement for VIP THE-PL

As of 1 January 2027, a new virtual interconnection point between German gas market area (Trading Hub Europe) and single entry-exit system in Poland (combining Polish national transmission system and transit gas pipeline system TGPS) will be established. The new VIP THE-PL (EIC: 21Z0000000005487) will be created based on existing interconnection points GCP GAZ-SYSTEM/ONTRAS (EIC: 21Z000000000456C) and Mallnow (EIC: 21Z00000000056S).

Operator Gazociągów Przesyłowych GAZ-SYSTEM S.A., ONTRAS Gastransport GmbH and GASCADE Gastransport GmbH (hereinafter – GAZ-SYSTEM, ONTRAS and GASCADE respectively, collectively referred to as “Parties” or “TSOs”) intend to conclude an agreement which will set out the establishment of the VIP THE-PL and update bilateral interconnection agreements (hereinafter called “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, all three TSO's shall invite the network users to comment on the proposed text within the scope 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 **21. September 2026 until 23. November 2026**.

The TSOs will evaluate the comments received during the consultation, and, if necessary, adjust the text of the agreement.

All market participants are invited to submit their comments and questions by sending them to the e-mail address: instrukcja@gaz-system.pl, netzkunden@ontras.com and kontakt@gascade.de.

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

1. Definitions:

Active Shipper shall mean the Shipper who is sending the Single-sided Nomination to the Active VIP TSO.

Active VIP TSO shall mean the VIP TSO receiving the Single-Sided Nomination from the Active Shipper at the VIP THE-PL.

Confirmed Quantity shall mean the hourly quantity of gas confirmed as scheduled to flow commercially on a gas day at the VIP THE-PL, as the result of the Matching Process (expressed in kWh).

DELORD shall mean Edig@s message used in Matching process which is sent by the Initiating VIP TSO to the Matching VIP TSO.

DELORD ANC shall mean the Edig@s message used by the Active VIP TSO for forwarding the Single-sided Nomination to the Passive VIP TSO.

DELRES shall mean Edig@s message used in Matching process which is sent by the Matching VIP TSO to the Initiating VIP TSO and contains the result of the Matching process.

Double-sided Nomination shall mean Nomination sent independently by the Shipper to its respective VIP TSO.

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Initiating VIP TSO shall mean the VIP TSO initiating the matching process by sending the necessary data to the Matching VIP TSO.

Matching shall mean the exchange of information between the VIP TSOs in order to compare and align Processed Quantities for Shippers at both sides of VIP THE-PL, which results in Confirmed Quantities for the Shippers.

Matching VIP TSO shall mean the VIP TSO performing the matching process and sending the result of the matching process to the Initiating VIP TSO.

Nomination shall mean the notification from the Shipper to the VIP TSO regarding the quantity of gas which the Shipper intends to deliver to/ offtake at the VIP THE-PL for each hour of the respective gas day. Nomination means Single-sided or Double-sided Nomination.

Passive Shipper shall mean the counterparty of the Active Shipper and, if the Single-sided Nomination is agreed between the two Shippers, not supposed to nominate quantities to the Passive VIP TSO.

Passive VIP TSO shall mean the VIP TSO at the other side of the VIP THE-PL than the Active VIP TSO, to whom the Active VIP TSO forwards the Single-sided Nominations, and at the same side of VIP THE-PL as the Passive Shipper.

Processed Quantity shall mean the quantity of gas determined by the Initiating VIP TSO and by the Matching VIP TSO, which takes into account the Shipper's nomination or re-nomination and contractual provisions as defined under the relevant transport contract and which is used as the basis for the matching process.

Renomination shall mean the change of previous Nomination.

Shipper shall mean the network user contracting the transmission service with a VIP TSO at the VIP THE-PL.

Shipper Code Pair shall mean a combination of distinctive alphanumeric identifiers used to identify the Shippers' accounts in THE market area and Polish market area. .

Singled-sided Nomination shall mean the Nomination sent to the Active VIP TSO by Active Shipper on behalf of itself and on behalf of the Passive Shipper.

Virtual Interconnection Point (VIP) shall mean two or more interconnection points, which connect the same two adjacent entry-exit systems, integrated together for the purposes of providing a single capacity service.

VIP THE-PL shall mean the VIP at the German-Polish border integrating the Interconnection Points: Grid Connection Point GAZ-SYSTEM/ONTRAS (GCP GAZ-SYSTEM/ONTRAS) and Interconnection Point Mallnow.

VIP TSO shall mean the transmission system operator of the VIP THE-PL on each side of the border responsible for marketing of the available capacities of the VIP THE-PL, the nomination and matching process on respective side of the border, allocation of gas quantities among the Shippers and confirming the final OBA report.

2. Nomination and Matching Process

2.1. Under this Umbrella Agreement:

2.1.1. ONTRAS shall act as Active VIP TSO and GAZ-SYSTEM shall act as Passive VIP TSO in context of processing single sided nominations.

2.1.2. ONTRAS shall act as Initiating VIP TSO and GAZ-SYSTEM shall act as Matching VIP TSO.

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2.2. The VIP TSOs agreed that both, Single-sided Nominations and Double-sided Nominations can be submitted for the VIP THE-PL.

2.3. The VIP TSOs hereby agreed that:

- regarding Single-sided Nominations:

ONTRAS shall be the Active VIP TSO and GAZ-SYSTEM shall be the Passive VIP TSO.

- regarding Matching Process:

GAZ-SYSTEM shall be the Matching VIP TSO and ONTRAS shall be the Initiating VIP TSO.

2.4. Application of DELORD ANC to forward a received Single -sided Nomination:

2.4.1.If THE Shipper submits Single-sided Nomination or Renomination for the respective Shipper Code Pair at the VIP THE-PL, ONTRAS immediately forwards the Nomination or Renomination via DELORD ANC to GAZ-SYSTEM.

2.4.2.GAZ-SYSTEM shall check whether for all forwarded Single-sided Nominations a valid authorisation from the concerned GAZ-SYSTEM Shipper to the nominating THE Shipper is in place.

2.4.3.If the respective THE Shipper is not authorized between GAZ-SYSTEM and Passive Shipper on GAZ-SYSTEM side, GAZ-SYSTEM shall reject the message.

2.5. Matching process

2.5.1.The VIP TSOs (ONTRAS and GAZ-SYSTEM) match Nominations and Renominations in kWh.

2.5.2.The VIP TSOs (ONTRAS and GAZ-SYSTEM) match Nominations and Renominations on an hourly basis in order to check whether a quantity nominated by the GAZ-SYSTEM Shipper at the VIP THE-PL is equal to the quantity nominated or renominated by the THE Shipper for the respective Shipper Code Pair and the reference period.

2.5.3.A matching cycle is successful if Processed Quantity for Shipper Code Pair for each hour of the gas is equal on both sides of the VIP THE-PL. The matching result is declared as the Confirmed Quantity for the respective Shipper Code Pair.

2.5.4.If the VIP TSOs identify any differences in the nominations submitted in their respective systems for the VIP THE-PL, the "lesser rule" shall apply, i.e., in case of different Processed Quantity for a given Shipper Code Pair at either side of the VIP THE-PL, the Confirmed Quantity will be equal to the lower of the two Processed Quantities.

2.5.5.The data exchange in the Matching process shall take place using Edig@s format and AS4 protocol.

2.6. Matching schedule

2.6.1.The VIP TSOs hereby agreed on harmonised interoperability rules predefined in NC INT regulation document and BRS Nomination document. The NC INT defines nomination and matching deadlines whereas BRS Nomination prescribes the details of Nomination and Matching processes.

2.6.2.According to role definitions under 2. and 3. ONTRAS initiates the Matching process by sending of DELORD message. GAZ-SYSTEM conducts the Matching process and informs by sending of DELRES message.

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2.6.3. The VIP TSOs hereby agreed on application of the following schedule for mutual communication.

2.6.3.1. DELORD

2.6.3.1.1. Notification Procedure:

2.6.3.1.1.1. In case ONTRAS receives Nomination before 14:00 on D-1, ONTRAS shall issue a DELORD to GAZ-SYSTEM not later than at 14:45 hours.

2.6.3.1.1.2. In case ONTRAS receives Renomination between 14:00 and 16:00 on D-1, ONTRAS shall issue a DELORD to GAZ-SYSTEM not later than at 16:45 hours.

2.6.3.1.1.3. In case that ONTRAS receives Renomination after 16:00 on D-1, ONTRAS shall also issue DELORD as soon as reasonably possible, not later than 75 minutes before the Renomination becomes effective (within two hours from the full hour within which the renomination was submitted).

2.6.3.1.2. Fallback:

2.6.3.1.2.1. For matching purposes, the last sent DELORD shall be used.

2.6.3.1.2.2. In case that ONTRAS does not issue DELORD for the respective Day, the Nominations or Renominations regarding respective Shipper Code Pairs at the VIP THE-PL for the respective Day shall be deemed zero.

2.6.3.2. DELRES

2.6.3.2.1. Notification Procedure

2.6.3.2.1.1. In case GAZ-SYSTEM Shipper submitted Nomination before 14:00 on D-1 or a DELORD has been received, GAZ-SYSTEM shall issue a DELRES to ONTRAS not later than at 15:30 D-1

2.6.3.2.1.2. In case GAZ-SYSTEM Shipper submitted Renomination between 14:00 and 16:00 on D-1 or a DELORD has been received, GAZ-SYSTEM shall issue a DELRES to ONTRAS not later than at 17:30 D-1.

2.6.3.2.1.3. In case that GAZ-SYSTEM Shipper submitted Renomination after 16:00 on D-1 or a DELORD was delivered, GAZ-SYSTEM shall issue the DELRES as soon as reasonably possible, not later than 30 minutes before a renomination becomes effective (within two hours from the full hour within which the renomination was submitted).

2.6.3.2.2. Fallback

2.6.3.2.2.1. For matching purposes, the last sent DELRES shall be used.

2.6.3.2.2.2. In case that GAZ-SYSTEM does not issue DELRES for the respective Day, the Nominations or Renominations regarding respective Shipper Code Pairs at the VIP THE-PL for the respective Day shall be deemed zero.

3. Allocation rules

3.1. The Parties agree that the allocated quantities for the Shippers are equal to the Confirmed Quantities.

4. Communication procedures in case of exceptional events

4.1. In the event when a failure, emergency situation or other contingency occurs in the territory of either Party and may affect the flow of natural gas through the interconnection points, the relevant dispatching centre is obliged to immediately notify the other Party by phone of such situation and to provide the following information:

4.1.1.cause of the emergency or other contingency situation;

4.1.2.impact of such occurrence on the volume of natural gas to be transported through the relevant interconnection point and the expected pressure level for such interconnection point;

4.1.3.the possible impact on the confirmed quantities for shippers active at VIP THE-PL;

4.1.4.expected duration of the failure, emergency or contingency situation, including the estimated time of its removal.

The information shall be subsequently confirmed in writing by e-mail.

4.2. The Parties shall immediately inform each other by phone of:

4.2.1.any change in the agreed or carried out maintenance works,

4.2.2.completion dates for maintenance works and contingency situations in the transmission system of either Party, which resulted in the restriction of transmission capacity through the interconnection points,

4.2.3.any connections along cross-border pipeline sections that may affect the transmission of natural gas through the interconnection points,

4.2.4.any change in the quality parameters of the natural gas flowing towards the interconnection point.

Such information shall be confirmed in writing by e-mail.

4.3. The dispatch services shall inform each other on the progress of the ongoing maintenance works and steps taken in order to remove a failure, emergency or contingency situation at least every four hours, or more frequently in exceptional situations on request of the other Party.