Public Consultation with regard to the business rules of the draft Interconnected Systems Agreement at the Entry point of NNGTS, Amfitriti

**Response Template**

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Would you like to keep the company name confidential? If yes, please tick the box **Yes**

Would you like to keep the contact person’s details confidential? If yes, please tick the box **Yes**

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| Comments on the business rules concerning the Entry point of NNGTS, Amfitriti | | |
| SECTION AND PARAGRAPH OF BUSINESS RULES | **COMMENTS** | **COMMENT TO BE KEPT CONFIDENTIAL?** |
| 2. Transportation Programs  2.1 Nominations  2.2 Re-nominations | According to paragraphs 2.1 and 2.2 no intraday flexibility is provided for the Gastrade Users. Therefore, even if the Terminal Access Code (TAC) of Gastrade SA foresees a future possibility for intraday flexibility, this will not be implemented due to the limitation provided in the Interconnected Systems Agreement.  In accordance with the comments we submitted to the Public Consultation of the RAEWW (20.11.2023-27.11.2023) for the first revision of – Alexandroupolis LNG Terminal Access Code and taking into account the relevant views of the Administrator reflected in the RAEWW Decision E-215/2023 (Government Gazette B' 7073/15.12.2023), which approved the first revision of the Code, in which it is stated that "the Operator points out that the flexibility that can be provided to users is dictated by the operating model of the Terminal and the limitations of the downstream system. The re-nominations cycle is described in the Interconnection Agreement with DESFA", we consider it necessary to repeat our opinion that it is necessary to provide in the Agreement the possibility of:   * on the day ahead (gas day D-1) level, a first renomination cycle up to the end of gas day D-1; * on the intraday (gas day D) level, re-nominations based on the hourly restrictions within each gas day, according to the provisions on the Hourly Renomination Rate (ΩΡΕΠNREC) of the Network Code of the Hellenic Gas Transmission System.   The harmonization of the Nominations/Re-nominations deadlines with the corresponding ones of the DESFA system and in particular with the corresponding provisions for the Revythoussa LNG Terminal, moves in the direction of equal treatment of the Users of the Revythoussa and Alexandroupolis Terminals, with multiple benefits for both the system as well as for the participants, without the risk of causing an unnecessary increase in costs for Alexandroupolis Users, which will ultimately burden the final consumer and make Alexandroupolis Terminal less commercially attractive compared to Revythoussa Terminal. |  |