A close-up photograph of a gas burner with a blue flame, centered in the middle of the page. The burner is dark, and the flame is bright blue with some white at the base, set against a dark background.

**Transparency of gas transmission system operators
in the Energy Community Contracting Parties**
Status Review

December 2019



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INTRODUCTION

1. About ECRB

The Energy Community Regulatory Board (ECRB) operates based on the Energy Community Treaty. As an institution of the Energy Community¹ the ECRB advises the Energy Community Ministerial Council and Permanent High Level Group on details of statutory, technical and regulatory rules and makes recommendations in the case of cross-border disputes between regulators. ECRB is the independent regional voice of energy regulators in the Energy Community. ECRB's mission builds on three pillars: providing coordinated regulatory positions to energy policy debates, harmonizing regulatory rules across borders and sharing regulatory knowledge and experience

2. Background

Transparency was an element of every legislative package adopted on EU level since the beginning of market liberalisation, as it is understood to be a necessary precondition for market functioning. With the experience gained during the establishment and development of cross-border wholesale natural gas markets in the EU, awareness for the need of a harmonised and comprehensive set of rules for transparency arose. Transparency provisions of Regulation (EU) 715/2009² provide a comprehensive set of definitions of the data to be published.

This is the third transparency review prepared by the ECRB Gas Working Group³ for the purpose of identifying the level of compliance of the transmission system operators with the transparency requirements of both Directive (EU) 73/2009⁴ and Regulation (EU) 715/2009.

¹ www.energy-community.org. The Energy Community comprises the EU and Albania, Bosnia and Herzegovina, Georgia, Kosovo*, Moldova, Montenegro, North Macedonia, Serbia and Ukraine. Armenia, Turkey and Norway are Observer Countries. [*Throughout this document the symbol * refers to the following statement: This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Advisory Opinion on the Kosovo declaration of independence.].

² https://www.energy-community.org/dam/jcr:31f64003-5c68-4f2a-9c1861927a6a61ec/Regulation_715_2009_GAS.pdf. Adapted and adopted for the Contracting Parties by Decision 2011/02/MC-EnC of the Ministerial Council.

³ The previous one was published in December 2018: https://www.energy-community.org/dam/jcr:bc8949bf-ada8-4925-a201-588bdc27c8eb/ECRB_gas_transparency_122018.pdf

⁴ https://www.energy-community.org/dam/jcr:004b3ca7-fa52-4633-875e-8ac1b2cea021/Directive_2009_73_GAS.pdf
Adapted and adopted for the Contracting Parties by Decision 2011/02/MC-EnC of the Ministerial Council.

3. Scope and methodology

The present report covers the Contracting Parties, namely Albania, Bosnia and Herzegovina (Republika Srpska entity), Georgia, Moldova, North Macedonia, Serbia and Ukraine. This monitoring activity shall assist the National Regulatory Authorities (NRAs) in enforcing implementation of the Regulation (EU) 715/2009.

Data presented in this report refers to status quo in **September 2019**. Data and analysis are based on information provided by the NRAs of the analyzed markets relating to the transparency requirements of Directive 2009/73/EC and Regulation (EC) 715/2009. Each publication item, as listed in the tables and Annex I of this report, is treated with equal weight for the results presented.

The results presented in the following chapters are sorted along the following lines:

- Implementation of transparency requirements of Directive (EU) 73/2009
- Implementation of transparency requirements of Regulation (EU) 715/2009
- Overall scoring in terms of publication of data pursuant to Regulation (EU) 715/2009;

In addition, the Annex provides a detailed analysis of the level of compliance with the individual publication requirements of Regulation (EU) 715/2009 per Contracting Party.

FINDINGS

1. General overview

The present report focuses on analyzing the factual level of compliance with the transparency requirements of Directive (EU) 73/2009 and of Regulation (EU) 715/2009. Summarizing, it can be observed that, **implementation** - i.e. the publication of complete set of information as required by the Energy Community *acquis communautaire* ('acquis') - is **lagging behind**.

At the same time the analysis also provides an overview the status of legal compliance of the national legislative framework of the Contracting Parties with the acquis. This information is relevant as lack of a legal basis requiring data publication must be accepted as one of the reason of poor factual compliance. From the assessment it can be concluded that **limited progress has been achieved in transposition** of the transparency requirements of the Third Energy Package in the Contracting Parties during last year.

- *Albania*: does not have a developed gas market at present. Nevertheless, in September 2015 Albania transposed the Third Energy Package and established a general legal framework for further developing the gas market in compliance with the acquires. Its gas sector is characterized by marginal domestic production of gas, the majority of which is consumed for own use in oil production and refining industry. The country is not connected to international gas networks. Albania has Gas Master Plan that involves gasification of the country too.
- *Bosnia and Herzegovina*: there is no State level legislation compliant with Third Energy Package. In the Federation of Bosnia and Herzegovina the gas related legislation does not transpose the major principle of the gas acquis that is why country is subject of several infringement cases. Republika Srpska has in general transposed the Third Package via the Gas Law 2018 and at same time decoupled its legal and regulatory framework from the State level.
- *Georgia* became Contracting Party of the Energy Community in July 2017 and has not transposed the Third Energy Package in national legislation yet.⁵ Even though, Georgia in 2018 adopted network codes that will assist in increasing data publication to a certain extent. Existing intergovernmental agreements and long-term contracts guarantee the availability and affordability of gas for Georgia but, at the same time, they restrict market liquidity and limit its potential for diversification. Bilateral market instruments should be

⁵ Transposition deadline for 73/2009 Directive and 715/2009 Regulation is 1st of January 2020 with limited enactment on cross-border trade.

launched by 31 December 2020. The establishment of an organized gas market in Georgia, including a gas exchange, is not expected for several more years due to the lack of liquidity.

- *Kosovo**: following the adoption of the Law on Natural Gas Sector, Kosovo* is to a large extent compliant with the Third Energy Package in the gas sector but has no functional gas sector. Kosovo* has not achieved notable progress in development of a gas market and interconnection with neighbors. In the future, Kosovo* plans to establish a gas supply route through an interconnector with the planned gas transmission system of Albania (the so-called ALKOGAP project).
- *Moldova*: has transposed Third Energy Package by adopting the Natural Gas Law and the relevant normative acts on transparency (Regulation on access to the transmission networks and congestion management no. 132/2016, Regulation on connection to the network and provision of transmission and distribution services 112/2019); there are two licensed TSOs in Moldova. One will only operate after commissioning of the second part of the interconnector Iași- Chișinău that connects Romania and Moldova.
- *Montenegro*: at present, no gas market exists in Montenegro. Despite this, and following the country's adoption of the 2015 Energy Law and the 2016 Law on Cross-Border Exchange of Electricity and Natural Gas, which jointly transpose the gas acquis, Montenegro is now in the process of drafting secondary legal acts in the gas sector.
- *North Macedonia*: has visibly shifted up a gear as regards the transposition of the Energy Community acquis. The new Energy Law, approved in June 2018, transposes the requirements of the Third Energy Package and clears the way towards ownership unbundling and certification of the country's transmission system operator.
- *Serbia*: Serbia's gas sector is governed by the Energy Law, which transposes the Third Energy Package, and numerous secondary legislation adopted by the national regulatory authority AERS. However, several important secondary acts were not updated in line with the Law. Moreover, the gap between the transposition of laws and their implementation in Serbia is widening each year.
- *Ukraine*: the Natural Gas Market Law transposes the majority of Third Energy Package provisions. Two main issues that remain in violation of the acquis are the deregulation of prices and independence of the transmission system operator. These issues present the biggest obstacles to gas market reform by maintaining a monopoly position of the incumbent gas suppliers and counter the positive trends that can be seen during recent period.

2. Compliance with the transparency requirements of Directive 2009/73 EC and Regulation 715/2009

Tables⁶ 1 and 2 below provide information on **factual compliance** of the Energy Community Contracting Parties with the transparency requirements of **Directive 2009/73 EC and Regulation 715/2009**. The green marked fields in the tables show the improvements achieved in the reporting period. For proof links to the relevant publications as well as details on compliance with the detailed provisions of Annex I of the Regulation 715/2009 were also made available by the NRAs in the process of compiling the present analysis. Based on the information reported by the CP NRAs, there is a **moderate progress by Moldova and Georgia** in implementation of Directive 73/2009 and Regulation 715/2009 requirements in terms of data publication.

⁶ Bosnia and Herzegovina did not provide an update on the current progress on compliance with transparency obligations and thus their data stayed the same as for last year.

Table 1 Implementation of transparency requirements of Directive 2009/73/EC

Relevant Article of Directive 2009/73/EC	Short description of information that has to be published	Body responsible for publishing	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
5 (Monitoring of SoS)	Report outlining the findings resulting from monitoring of security of supply, as well as any measures taken or envisaged to address them	Contracting Party, NRA	No	No	√	No	No	No	√
8 (Technical rules)	Technical rules establishing the minimum technical design and operational requirements for the connection to the system of LNG facilities, storage facilities, other transmission or distribution systems and direct lines	TSO, NRA	No	No	√	No	No	√	√
13(3) Tasks of transmission, storage and/or LNG system operators	Terms and conditions, including rules and tariffs, for the provision of balancing services by the TSOs	TSO ; NRA methodology for charges	No	√	√	√	No	√	√
15(2d) Unbundling of transmission system owners and SSOs	Annual report, setting out measures taken to ensure that discriminatory conduct is excluded	person/body responsible for monitoring the compliance programme	No	No	No	No	√	No	nap

Relevant Article of Directive 2009/73/EC	Short description of information that has to be published	Body responsible for publishing	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
16(3) Confidentiality for TSOs and transmission system owners	Information necessary for effective competition and the efficient functioning of the market	TSOs, SSOs, LNG operators and transmission system owners	No	No	No	No	No	√	NAP
22(4) Network development and powers to make investment decisions	Results on consultation process regarding TYNDP, in particular possible needs for investments	NRA	No	No	No	No	No	√	√
23(1) Decision- making powers regarding connection of storage facilities, LNG regasification facilities and industrial customers to the transmission system	Procedures and tariffs for connection of storage facilities, LNG regasification facilities and industrial customers to the transmission system	TSO	No	√	No	√	√	√	√

Relevant Article of Directive 2009/73/EC	Short description of information that has to be published	Body responsible for publishing	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
31(2) Unbundling of accounts	Annual accounts in accordance with the rules of national law concerning the annual account of LLC...	NRA, TSO	No	No	No	√	No	No	√
32(1) Third- party access	Transmission, distribution and LNG tariffs or methodologies, where only methodologies are approved	TSOs, DSOs, LNG operators, NRAs	√	√	√	√	√	√	√
33 (1)	Criteria according to which the access regime applicable to storage facilities and linepack may be determined	TSOs, LNG operators, NRAs	No	No	No	No	No	√	√
33 (3)	Main commercial conditions for the use of storage, linepack and other ancillary services, on annual basis	TSOs, LNG operators, NRAs	No	No	No	No	No	√	√
33 (4)	Storage tariffs in case of regulated access to storage	TSOs, LNG operators, NRAs	No	No	No	No	No	√	√

Table 2 Implementation of transparency requirements of Regulation 715/2009

Relevant Article of Regulation 715/2009	Short description of information that has to be published	Body responsible for publishing	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
Art.3 Certification of TSOs	Decision on TSO certification, and, in case the decision different from the opinion of the ECS, the reasoning underlying such decision	NRA	√	X	X	X	X	√	X
Art.15 Third- party access services concerning storage and LNG facilities	Data on the use and availability of services, in a time-frame compatible with the LNG and storage facility users' reasonable commercial needs	LNG and SSO operator	X	nap	nap	X	nap	nap ⁷	√
Article 16 (2) Principles of CAM and CMP concerning TSOs	Capacity allocation mechanisms	TSO	X	√	x	X	√	√	√
Article 16 (3) Principles of CAM and CMP concerning TSOs	Congestion management procedures	TSO	X	√	x	X	√	√	√
Article 17 (2) Principles of CAM and CMP concerning storage and LNG facilities	Capacity allocation mechanisms	LNG and SSO operator	X	nap	x	X	nap	nap	√

⁷ Existing storage is exempted from third- part access rules. Any new storage will have regulated TPA and tariffs. AERS issued tariff methodology in 2014.

Relevant Article of Regulation 715/2009	Short description of information that has to be published	Body responsible for publishing	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
Article 18(1) Transparency requirements concerning TSOs	Detailed info. regarding services offered and the relevant conditions applied, technical information necessary for network users to gain effective network access	TSO	X	√	x	√	√	√	√
Article 18(2) Transparency requirements concerning TSOs	Reasonably and sufficiently detailed information on tariff derivation, methodology and structure	TSO or NRA	√	√	√	√	√	√	√
Article 18(3) Transparency requirements concerning TSOs	Info. on technical, contracted and available capacities on a numerical basis for all relevant points including e/e points on a regular and rolling basis, in a user-friendly and standardized manner	TSO	X	√	X	X	X	X	√
Article 18(6) Transparency requirements concerning TSOs	Ex- ante and ex- post supply and demand information, based on nominations, forecasts and realized flows in and out of the system	TSO	X	X	X	X	X	X	X ⁸
Article 18(7) Transparency requirements concerning TSOs	Measures taken as well as costs incurred and revenue generated to balance the system	TSO	X	X	X	X	X	X	X ⁹

⁸ Data of actual flows in the transmission system is published.

⁹ No, only data on the imbalance price.

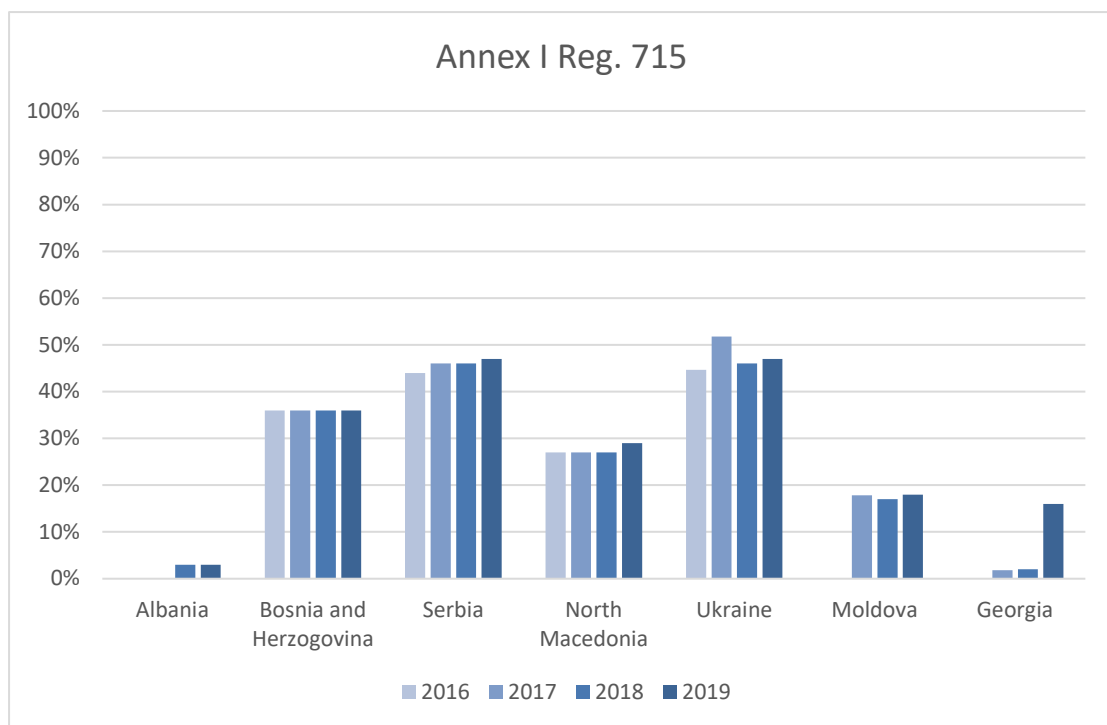
Relevant Article of Regulation 715/2009	Short description of information that has to be published	Body responsible for publishing	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
Article 19 (1) Transparency requirements concerning storage and LNG facilities	Info. regarding services offered and the relevant conditions applied, technical information necessary for new LNG and storage facility users to gain effective network access	SSO and LNG operator	X	nap	nap	√	nap	nap	√
Article 19 (2) Transparency requirements concerning storage and LNG facilities	Info. on contracted and available storage and LNG facility capacities on a numerical basis, on a regular and rolling basis and in a user-friendly standardized manner	SSO and LNG operator	X	nap	nap	X	nap	nap	√
Article 19 (4) Transparency requirements concerning storage and LNG facilities	The amount of gas in each storage and LNG facility, inflows and outflows, and the available storage and LNG facility capacities, including for those facilities exempted from TPA.	SSO and LNG operator	X	nap	nap	X	nap	X	√
Article 19 (5) Transparency requirements concerning storage and LNG facilities	Sufficiently detailed information on tariff derivation, the methodologies and the structure of tariffs for infrastructure under regulated TPA	SSO and LNG operator or NRA	X	nap	nap	√	nap	√	√
Article 21(2) Balancing rules and imbalance charges	Calculation methodology for imbalance charges as well as final tariffs	TSO or other competent authority	X	X	√ (calculation methodology)	X	X	√	√

3. Compliance with the transparency requirements of Annex I of Regulation 715/2009

Analysis has been also made as regards the implementation of the transparency requirements of Annex I of Regulation 715/2009. The results shown in figure were calculated as ratio of published data items by all data items required by Annex I. Figure 1 does **not reveal progress in 2019 compared to the past year, except of noticeable improvement in Georgia** for satisfying certain very basic requirement of the Regulation. **Serbia and Ukraine are front runners** in terms of compliance with the Annex I of 715/2009 Regulation while **others are lagging behind**, this status-quo has not changed in 2019. It is worth mentioning **Moldova's attempts to increase** data transparency coverage. After the adoption of the Regulation on connection to the network and provision of transmission and distribution services in april 2019, the TSO published the draft transmission contract on its website.

For an in-depth understanding of overall scoring indicator of Annex, I of 715/2009 Regulation in 2019, please refer to Annex I.

Figure 1 Overall scoring in terms of publication of data pursuant to Annex I of Regulation 715/2009.



4. Summary of findings

In general, it can be concluded that during the past year a certain level of transparency has been established in the Contracting Parties. However, **improvements and further progress are needed.**

- Primary and secondary legislation setting the rules for gas market functioning in Serbia and Ukraine provide a solid background for fulfilling the transparency requirements of both Directive 73/2009 and Regulation 715/2009. Nevertheless, the unbundling of transmission system operators in both countries has not been finalized and many activities envisaged by the network code are not yet performed. Having in mind that the implementation of the majority of secondary legislation in Ukraine started in 2016, certain progress is already visible, although full implementation of the transparency requirements is still pending.
- Primary and secondary legislation implementing 3rd Package gas transparency requirements in other analyzed Contracting Parties is still under preparation and currently implemented transparency provisions are based on the existing gas market related rules.
- Moldova adopted additional rules setting the framework for provision of transmission and distribution services that obliged the TSO to publish the draft of the transportation contract
- Even though Georgia revealed improvement in transparency requirement fulfillment of the Regulation and Directive, it still lags behind in transposition of not only transparency requirements but also all other provisions of Third Energy Package. However, having in mind that Georgia became Contracting Party later and having exemption from cross-border related requirements, it is expected that limited degree of compliance will be improved in the coming years.

Annex: List of Publication Per Items Monitored

The following table provides a detailed assessment of the compliance status with the individual publication requirements of Annex I of Regulation (EU) 715/2009. Fulfilled requirements are marked green, whereas lack of compliance is marked red. Statuses are based on the survey answers of Contracting Parties. Note that, red color means non-compliance, green color means compliance, while yellow color means compliance status change compared to the previous year.

Relevant Article of Annex I of Regulation 715/2009	Short description of information that has to be published	Albania	Bosnia and Herzegovina	North Macedonia	Georgia	Moldova	Serbia	Ukraine
1.9.	Planned maintenance periods that might affect network users' rights from transport contracts and corresponding operational information with adequate advance notice; changes to planned maintenance periods; updated regularly	no	yes	yes	no	no	yes	yes
3.1.2.a	Detailed and comprehensive description of the different services offered and their charges	no	yes	yes	yes	yes	yes	yes
3.1.2.b	Different types of transportation contracts available for these services	no	no	yes	yes	Yes	yes	yes
	Network code and/or the standard conditions outlining the rights and responsibilities of all network users including:	yes	yes	yes	yes	no	yes	yes
	1. Harmonized transportation contracts and other relevant documents;	no	yes	yes	yes	no	yes	yes

	2. if relevant for access to the system, for all relevant points as defined in paragraph 3.2 of this Annex, a specification of relevant gas quality parameters, including at least the gross calorific value and the Wobbe index, and the liability or costs of conversion for network users in case gas is outside these specifications;	no	yes	yes	yes	yes	yes	Yes (not for each point, but for territory regions)
	3. if relevant for access to the system, for all relevant points information on pressure requirements;	no	yes	yes	no	yes	yes	yes
	4. the procedure in the event of an interruption of interruptible capacity, including, where applicable, the timing, extent, and ranking of individual interruptions (for example pro-rata or first-come-last-interrupted);	no	yes	yes	no	no	yes	No
3.1.2.d	Harmonised procedures applied when using the transmission system, including the definition of key terms	no	yes	no	yes	yes	yes	yes
3.1.2.e	Publish provisions on:							
	1. capacity allocation	no	yes	no	no	yes	yes	yes
	2. congestion management	no	yes	no	no	yes	yes	yes
	3. anti-hoarding	no	no	no	no	no	yes	no
	4. reutilization procedures	no	no	no	no	no	yes	no
3.1.2.f	Rules applicable for capacity trade on the secondary market vis-à-vis the transmission system operator	no	no	no	no	yes	yes	yes

3.1.2.g	Rules on balancing and methodology for the calculation of imbalance charges	no	yes	no	yes	no	yes	yes
3.1.2.h	the flexibility and tolerance levels included in transportation and other services without separate charge, as well as	no	yes	no	yes	no	yes	yes
3.1.2.h	any flexibility offered in addition to this and the corresponding charges	no	no	no	no	no	no	no
3.1.2.i	Detailed description of the gas system of the transmission system operator and its relevant points of interconnection as defined in paragraph 3.2 of this Annex	no	yes	no	no	yes	no	yes
3.1.2.i	Names of the operators of the interconnected systems or facilities	no	no	no	no	yes	no	yes
3.1.2.j	Rules applicable for connection to the system operated by the transmission system operator	yes	yes	Yes	no	no	yes	yes
3.1.2.k	Information on emergency mechanisms, as far as it is the responsibility of the TSO, such as measures that can lead to the disconnection of customers groups and other general liability rules that apply to the transmission system operator	no	yes	Yes	no	no	yes	yes
3.1.2.l	Procedures agreed upon by TSOs at interconnection points, of relevance for access of network users to the transmission systems concerned, relating to interoperability of the network	no	yes	no	no	no	yes	yes
3.1.2.l	Agreed procedures on nomination and matching procedures	no	yes	no	no	no	yes	yes

3.1.2.m	Detailed and comprehensive description of the methodology and process, including information on the parameters employed and the key assumptions, used to calculate the technical capacity	no	yes	no	no	no	no	no
3.3.1 3.3.2 3.3.3	At all relevant points the following information for all services and ancillary services:							
	(a) the technical capacity for flows in both directions;	no	yes	no	no	yes	No	yes
	(b) the total contracted firm and interruptible capacity in both directions	no	no	no	no	no	No	yes (contracted capacity only from EU members to Ukraine)
	(c) the nominations and re-nominations in both directions;	no	no	no	no	no	no	no
	(d) the available firm and interruptible capacity in both directions;	no	yes	no	no	no	no	no ¹⁰
	(e) actual physical flows;	no	no	no	no	no	no	yes
	(f) planned and actual interruption of interruptible capacity;	no	no	no	no	no	no	yes
(g) planned and unplanned interruptions to firm services as well as the information on restoration of the firm services (in particular, maintenance of the system and	no	no	no	no	no	yes	yes	

¹⁰ historical information is published for 3 last years (since 2019)

	the likely duration of any interruption due to maintenance).							
3.3.4.	Measured values of the gross calorific value or the Wobbe index at all relevant points, on a daily basis	no	no	Yes	yes	no	yes	yes
	Preliminary figures at the latest 3 days following the respective gas day	no	no	Yes	No	no	yes	no
	Final figures within 3 months after the end of the respective month	no	no	Yes	yes	no	yes	yes
3.3.5.	Available capacities, booked and technical capacities, on an annual basis, for all relevant points,	no	yes	no	no	no	no	yes
	over all years where capacity is contracted plus 1 year, and	no	no	no	no	no	no	No
	at least for the next 10 years.	no	no	no	no	no	no	no
	(a) interconnection point where the capacity is sold;	no	no	no	no	no	no	yes
	(b) type of capacity, i.e. entry, exit, firm, interruptible;	no	no	no	no	no	no	no
	(c) quantity and duration of the capacity usage rights;	no	no	no	no	no	no	no
	(d) type of sale, e.g. transfer or assignment;	no	no	no	no	no	no	no
	(e) the total number of trades/transfers;	no	no	no	no	no	no	no
(f) any other conditions known to the TSO as mentioned in 3.3.	no	no	no	no	no	no	no	
3.4.1	TSOs shall ensure the publication on a daily basis and updated every day the aggregated amounts of capacities offered, and contracted on the secondary market (i.e. sold from one network user to	no	no	no	no	no	no	no

	another network user), where the information is available to the TSO:							
	(a) interconnection point where the capacity is sold;	no	no	no	no	no	no	no
	(b) type of capacity, i.e. entry, exit, firm, interruptible;	no	no	no	no	no	no	no
	(c) quantity and duration of the capacity usage rights;	no	no	no	no	no	no	no
	(d) type of sale, e.g. transfer or assignment;	no	no	no	no	no	no	no
	(e) the total number of trades/transfers;	no	no	no	no	no	no	no
3.4.2.	(a) a description of standardised products which can be sold on the secondary market;	no	no	no	no	no	yes	no
	(b) lead time for the implementation/acceptation/registration of secondary trades. In case of delays the reasons have to be published;	no	no	no	no	no	yes	no
	(c) the notification to the transmission system operator by the seller or the third party as referred to under 3.4(1) about name of seller and buyer and capacity specifications as outlined in 3.4(1).	no	no	no	no	no	yes	no
3.4.3.	Regarding the balancing service, does the TSO provide to each network user, for each balancing period, its specific preliminary imbalance volumes and cost data per individual network user, at the	no	no	no	no	no	yes	yes

	latest 1 month after the end of the balancing period?							
	Is final data of customers supplied according to standardised load profiles within 14 months later provided?	no	no	no	no	no	yes	no
3.4.4.	Are flexibility services, other than tolerances, for third party access offered?	no	no	no	no	no	no	no
	Is ex-post information on the aggregate utilization of every flexibility service at the end of each gas day published?	no	no	no	no	no	no	no
3.4.5.	Per balancing zone:							
	The amount of gas in the transmission system at the start of each gas day and	no	nap	no	no	no	no	no
	The forecast of the amount of gas in the transmission system at the end of each gas day	no	nap	no	no	no	no	no
	Is amount of gas in the transmission system published on an hourly basis?	no	nap	no	no	no	no	no
	Alternatively, per balancing zone:							
	The aggregate imbalance position of all users at the start of each balancing period	no	nap	no	no	no	no	no
	The forecast of the aggregated imbalance position of all users at the end of each gas day	no	nap	no	no	no	no	no
3.4.6.	Are user-friendly instruments for calculating tariffs provided?	no	nap	Yes	no	no	no	no