

Evaluation of responses to the consultation on the Decision for the selection of a booking platform on the German-Polish border¹

August 2018

1 Introduction

Pursuant to Article 37(3) of the Network Code on Capacity Allocation Mechanisms (“CAM NC”)², TSOs are required to reach a contractual agreement to use a single booking platform to offer capacity on the two sides of their respective interconnection points (“IPs”) or virtual interconnections points (“VIPs”). The TSOs should agree within six months from the entry into force of the CAM NC. If no agreement is reached by the TSOs the matter is referred to the respective national regulatory authorities (“NRAs”). Within a period of a further six months, the NRAs shall jointly select the single booking platform for a period not longer than three years. If the NRAs fail to reach an agreement within the six-month period, the decision is referred to the Agency, in accordance with Article 8(1) of Regulation (EC) No 713/2009.

On 19 April 2018, the German and the Polish NRAs transferred to the Agency their competence to decide on the use of a single booking platform on the two interconnection points on the German-Polish border.

From 5 June 2018 to 27 June 2018, the Agency organised a public consultation. The Agency asked stakeholders whether the booking platforms meet the EU and national legal requirements and about the booking platform services and functionalities that may be relevant for the selection of the platforms.

2 Summary of responses

2.1 About the respondents

The Agency received 29 responses to the consultation. Annex I presents the list of the respondents.

Polish Confederation Lewiatan, NET4GAS and National Grid did not make use of the template provided by the Agency. The European Federation of Energy Traders (EFET) submitted a response three weeks after the closing of the publication consultation. This late response has not been taken into account, but it is published along with the other consultation responses on the Agency’s website.

Out of the respondents:

- ten parties use only PRISMA;
- eight parties use both GSA and PRISMA;
- three parties use all three booking platforms;
- three parties use only GSA;
- one party uses both PRISMA and RBP;
- one party uses only RBP.

The specific details of who uses which platforms are in Annex I (Table 5).

¹ The Agency’s proceeding 2-2018

² Commission Regulation (EU) 2017/459 of 16 March 2017

2.2 About the consultation questions and answers

The tables below are organised according to the consultation questions. They provide the respective views from the respondents as well as the response from the Agency on how their comments were taken into account. The first subsection discusses “compliance” and the second subsection “other criteria”. The annexes II and III offer a number of tables with (detailed) figures from the analysis of the responses for “compliance” and “other criteria”, respectively.

2.2.1 Respondent views on Compliance

Table 1 offers the overview of the “compliance” criteria covered in the consultation, whereas Table 2 offers the views expressed by respondents and the Agency response.

Table 1. Reference table “compliance”

Compliance criteria	
EU regulation	
1	Allocation of firm capacity
2	Allocation of interruptible capacity
3	Bundling of capacity products
4	Ascending clock auctions (yearly, quarterly and monthly)
5	Uniform price auctions (day-ahead, within-day)
6	Day-ahead bid roll-over
7	Support of kWh/h and kWh/d as capacity unit
8	Secondary capacity trading
9	Automated bidding
10	Reporting of platform transactions (bidders and public)
11	Bundling of capacity on 1:n situations
12	Offer of competing capacity products
13	Allocation of incremental capacity
14	Surrender of capacity
15	Buyback of capacity
16	REMIT reporting obligations
17	Interoperability and data exchange obligations
National regulation	
18	Assignment to balancing groups
19	Support for capacity upgrade services
20	Use of protocol AS4 and data format Edig@s-XML
21	Anonymity of all trading procedures

Main results

The majority of respondents indicated that all booking platforms comply with EU regulation and with national regulation (where applicable). For the three booking platforms, some respondents pointed out possible issues of non-compliance on some criteria. The Agency will pay special attention to these criteria and booking platforms in its further proceedings to select the booking platform(s). See Annex II, Table 6 for the full overview of respondents’ views on (non-)compliance

Comments received

Table 2: Views on compliance of booking platforms with EU and national regulations

Respondent's views	ACER response
Compliance – EU regulation	
<ol style="list-style-type: none"> 1. Most stakeholders indicate that the requirement stemming from the EU regulations are met by all booking platforms (requirements 1-17). 8 out of 12 respondents evaluate the GSA platform as meeting EU legal requirements. 20 out of 21 respondents evaluate the PRISMA platform as meeting EU legal requirements. 3 out of 4 respondents evaluate the RBP platform as meeting EU legal requirements. However: 2. One or more respondents evaluate that GSA is not meeting legal requirements for requirement 2 (Axp0), 3 (Axp0, Vattenfall), 5 (Vattenfall), 6 (Axp0), 7 (EDF, Vattenfall), 8 (Axp0), 9 (Vattenfall), 11 (EDF) and 13 (EDF). 3. One or more respondents evaluate that PRISMA is not meeting legal requirements for requirements 7 (EDF) and 11 (EDF). 4. One or more respondents evaluate that RBP is not meeting legal requirements for requirement 6 (Axp0) and 14 (Axp0). 5. Several stakeholder clarify their positions in the comments section <ul style="list-style-type: none"> • EDF remarked that they do not understand what is meant by “1:n situations”. They also point out that they have not been made aware of incremental capacity offers on GSA, but that this may be due to lack of non-binding market interest. • Vattenfall explain that at the time they used the platform, those requirements were not met. Vattenfall indicated that it last used the GSA platform in June 2016. • FGSZ notes that although all requirements are met on the RBP platform, not all requirements are used by (all) TSOs. • 6 replies (Fluxys, GASCADE, GRTgaz, GTS, ONTRAS, and Thyssengas) remark that requirement 17 is unclear. 	<p>The Agency takes note that the majority of respondents evaluate the platforms as compliant with the EU legal requirements;</p> <p>The Agency also notes that a number of respondents flag that some platforms do not meet all requirements. The Agency will take a close look into those requirements considering:</p> <ul style="list-style-type: none"> • The Baringa study of 2015 which found that GSA already fully met requirements 2, 3, 7 and 9, PRISMA already fully met requirement 11 • Some respondents may not have been fully aware of all the requirements, as indicated in some responses, or they may not have used a specific service.
Compliance – national regulation	
<ol style="list-style-type: none"> 6. 9 respondents reply (Fluxys, GASCADE, GMT, GRTgaz, GTS, ONTRAS, PGNiG, Thyssengas and VNG) that PRISMA is not (yet) compliant with requirement 20, of which two (GASCADE 	<p>The Agency takes note of the responses and will duly evaluate how to treat the national requirements in its assessment of the offers, in which the</p>

Respondent's views	ACER response
<p>and ONTRAS) point out that this is not a legal requirement. On the other hand, 6 participants (Eni, PKN ORLEN, TOE, Uniper, Vattenfall and WINGAS) evaluate that PRISMA does comply with this requirement.</p> <p>7. FGSZ remarks that RBP does not (yet) comply with requirement 19.</p> <p>8. Uniper remarks that GSA is not (yet) compliant with requirement 18 and 19 and that RBP is not (yet) compliant with requirements 18, 19 and 20.</p> <p>9. GA and PUŁAWY assessed that GSA meets requirement 18, 19 and 21. However, the comments they provide do not match this score. The comment reads: <i>“From the information received from the GSA, the GSA Platform is open to discuss about the implementation of such a solution on the GSA provided that the detailed technical specifications will be provided.”</i></p>	<p>Booking Platforms themselves provide information on meeting the national requirements.</p>
Compliance – proposed by stakeholders	
<p>10. Four participants (Fluxys, GASCADE, ONTRAS and Thyssengas) propose one additional legal requirement, namely the possibility to market different types of firm capacity (e.g. DZK, BZK) to allow for the marketing of country specific capacity products.</p> <p>11. VNG remarks that PRISMA should report the surcharge of every single auction and not only the "market clearing price", because in case of competing capacities the clearing price does not provide the final result.</p>	<p>The Agency takes note of the additional proposals and will duly evaluate whether they are truly legal requirements or not.</p>

2.2.2 Respondent views on Compliance

Table 3 offers the overview of the “other criteria” covered in the consultation, whereas Table 4 offers the views expressed by respondents and the Agency response.

Table 3. Reference table “other criteria”

Other criteria	
21	Authorisation level management
22	Network point display and administration
23	Secure platform access for network users
24	Peak service load
25	(Financial) insurances taken up to cover disruptions
26	Data backup and security
27	Continuing development (EU / national regulations)
28	Shipper and user registration on the platform
29	Graphical user interface of the platform
30	Options for connection to the platform
31	TSO and shipper automated communication
32	Multi-currency booking
33	Credit limit check
34	(efficient) Cost reflective fees
35	Cost transparency for TSOs
36	Helpdesk availability outside business hours
37	Helpdesk availability in English
38	Helpdesk availability in other languages
39	Measures for data security and confidentiality, preservation of data
40	User input in platform development
41	Price-effects / Transport tariff-effects
42	Capacity conversion service

Main results

The respondents confirmed the relevance of the “other criteria” beyond the legal requirements (Table 7 in Annex III). These other criteria stem from the Baringa study of 2015, and the TSOs and NRAs involved in this case confirmed the relevance of a number of other criteria during the Agency’s Hearing of the parties on 18 June 2018. It is noteworthy that a number of criteria are deemed relevant by a select number of respondents because certain criteria have a stronger relevance depending whether the respondent was a TSO or a network user (e.g. 5 respondents remarked that criterion (22) is not applicable to them as it is a tool for TSOs and not for network users).

The respondents expressed their views on the importance of each (relevant) criterion. The least valued criterion according to the respondents is criterion (38) *helpdesk availability in other languages (than English)*. The Agency deems the awarded scores particularly helpful to come forth with a reduced list of quality related criteria to use in its proceedings to select booking platform(s).

The respondents also expressed their views based on their individual experiences on how well the booking platforms perform on the consulted criteria, giving a score of 1 (poor), 2 (ok) or 3 (excellent). The Agency will carry out its own assessment of the booking platform performance on quality based on information submitted by the booking platforms. The consultation results serve as additional supporting information.

The table with the overall rankings and the points awarded is available in Annex III (Table 8). Additionally, the Annex III presents a more detailed view of the scoring per type of respondent (network users vis-à-vis TSOs, Tables 9 and 10) and the average performance scores awarded to the booking platforms on each criterion (Table 11).

Comments received

Table 4: Views on “other criteria” that cover quality-related aspects of booking platforms

Respondent’s views on relevance, importance and performance of BPs with respect to “other criteria” (limited to criteria with at least 10 respondents commenting, full responses are published online)	ACER response
Other criteria – IT related (21-31)	
<ol style="list-style-type: none"> 1. 11 respondents commented that (criterion 23) secure access and protection of a critical infrastructure and economically sensitive data are vital for their business (Eni, Fluxys TENP, GASCADE, GRTD, Hermes, ONTRAS, PGNiG, FGSZ, Shell, Thyssengas, VNG). 2 respondents connected the secure access to the platform to the use of open data protocols as they would allow easier/more secure integration with the IT system of the connecting party (PKN ORLEN, TOE). 10 respondents commented that (criterion 26) data backup and security are very important for any IT system (e.g. referring to the ISO 27001 standard) (Gazprom export, GMT, Gasunie, Hermes, PGNiG, PKN ORLEN, FGSZ, TOE, Vattenfall, VNG). 2. 15 respondents commented on the importance of the booking platforms being able to deal with a high number of transactions (criterion 24), especially for short-term bookings (EDF, ENI, Fluxys TENP, GASCADE, Gazprom export, GRTD, GTS, Hermes, ONTRAS, PGNiG, FGSZ, Shell, Thyssengas, TOE, VNG). 3. 14 respondents commented on the importance of continuing development of the booking platforms in particular to ensure continued compliance with EU and national regulations (Enagas, ENI, Fluxys TENP, GASCADE, Gazprom Export, GMT, GRTD, GTS, Hermes, ONTRAS, FGSZ, Thyssengas, Vattenfall, VNG). 4. 11 respondents noted the importance of a well-designed graphical user interface as it is the most frequently used way to connect to the platform (EDF, ENI, Hermes, PGNiG, PKN ORLEN, FGSZ, Shell, TOE, Tauron, Vattenfall, VNG). 5. The average performance scores for the three booking platforms are 2 or higher (meaning performance is satisfactory). There are five exceptions: GSA received an average score of 1.8 for credit limit check and 1.8 for the (voluntary) capacity conversion service, PRISMA received 1.8 for the price-effects/tariff effects, and RBP received 1.8 for the helpdesk availability in English and 1.7 for the (voluntary) capacity conversion service. 	<p>The Agency observes that the “other criteria” included in the consultation are in general deemed relevant by the respondents. Additionally, the Agency observes that there are different views on the importance of the criteria depending on the role (TSO or network user).</p> <p>The Agency furthermore acknowledges the comments made on the relevance and importance of the criteria and the performance of the booking platforms according to the respondents’ assessments. The Agency finds the respondents’ comments largely aligned, and understands that there are no significantly differing views on the same criterion;</p> <p>Based on the assessment of the responses, the Agency believes there are four priority categories of criteria:</p> <ul style="list-style-type: none"> • IT security related criteria; • Governance related criteria; • User friendliness related criteria; • Price related criteria (which includes price transparency and price). <p>The further treatment of these criteria is discussed in the next section of this document.</p>

Respondent's views on relevance, importance and performance of BPs with respect to "other criteria" (limited to criteria with at least 10 respondents commenting, full responses are published online)	ACER response
Other criteria – user-friendliness (32-39)	
<p>6. 14 respondents commented that the (38) availability of a helpdesk in other languages than English is not an essential feature of a booking platform because it adds little and is a cost driver (EDF, Enagas, Eni, Fluxys TENP, GASCADE, Gazprom export, GMT, GRTD, GTS, ONTRAS, FGSZ, TAURON, TOE). 10 respondents commented on the importance of the availability of the helpdesk outside business hours for reliability of within-day trades (EDF, ENI, Gazprom export, Hermes, PGNiG, PKN ORlen, FGSZ, TOE, Tauron, VNG).</p> <p>7. 10 respondents commented on the need for transparent cost based on clear cost drivers (Enagas, GA, GA Pulawy, Handen, PGNiG, PKN ORLEN, FGSZ, TOE, Vattenfall, VNG).</p>	See above
Other criteria – additional criteria (40-42)	
<p>8. 13 respondents commented on the importance of dealing with user input for the development of the platforms (ENI, Fluxys TENP, GASCADE, GRTD, Hermes, ONTRAS, PGNiG, FGSZ, Shell, Thyssengas, TOE, Vattenfall, VNG). Some respondents find the introduction of a new body for user input not necessary as it may increase the operational costs of the platform (Grupa Azota, GA Pulawy).</p> <p>9. 9 respondents value the voluntary implementation of the capacity conversion service by booking platforms (ENI, Fluxys TENP, GASCADE, GRTD, GTS, ONTRAS, RBP, Thyssengas, VNG).</p>	See above
Other criteria – proposed by stakeholders	
<p>10. 8 respondents included a proposal for other criteria.</p> <ul style="list-style-type: none"> Fluxys, GASCADE, ONTRAS and Thyssengas propose to add a criterion on the procedure for processing of customers' requests to ensure that the needs of every TSO connected to the platform are fulfilled in an equal way. GASCADE and Thyssengas also propose to have a transparent and reasonable structure of governance allowing the stakeholders/customers of the platform with the possibility to become part of the decision making process. A clear governance structure can provide, in case of conflicting interests, means to make a final decision on the pending issue. GMT proposes to add fallback solutions if booking platform fails to provide a service, in order to secure business continuity and limit the financial exposure of firms. GMT also 	<p>The Agency welcomes the additional criteria finding that the proposals from Fluxys, GASCADE, ONTRAS and Thyssengas is already captured in criterion 40 on governance.</p> <p>The proposals from GMT are in the Agency's view relevant and already captured in the criteria on a securely and reliably operating the booking platform.</p>

Respondent's views on relevance, importance and performance of BPs with respect to "other criteria" (limited to criteria with at least 10 respondents commenting, full responses are published online)	ACER response
<p>proposes to include as a criteria that data exchange between TSO and booking platform should be checked two-ways before published to the market, since GMT experienced mismatches in the past between the data published by the TSO and the booking platform. GMT believes that this leads to confusion in the market and increases the financial exposure of trading firms.</p> <ul style="list-style-type: none"> • GTS proposes to include as a criterion extensive support for other services, like FCFS, because a platform should be able to support other TSO-services, such that TSOs are able to lower their backend cost and share the cost with other TSOs. • FGSZ proposes to include as a criterion that the graphic user interface is available in multiple languages where the user may select its preferred language. • Thyssengas proposes to add that binding contractual rules and / or defined processes for the platform operator should be in place to ensure continuous development according to technical standard; to ensure implementation of new regulatory obligations; to ensure maintenance of the platform. Thyssengas also proposes to add a criterion to allow for the marketing of country specific capacity products to optimize the offer of firm capacity as TSOs use different types of firm capacities. • WINGAS proposes, as a criterion, the ease of use of having only one platform in Europe only having one central booking platform is preferable from a shipper's perspective because of lower learning costs and economies of scale for the shipper's back-end IT costs. WINGAS also proposes to add, as a criterion, economies of scale for platform development and maintenance as the cost of setting up a platform mainly consists of fix costs that are not related to the number of TSOs using the platforms. WINGAS thinks PRISMA is ideally suited to become the central, cost effective platform. • National Grid considers two factors of utmost importance: cost transparency and service level guarantees; "cost reflectivity must be the overriding principle to avoid cross subsidisation and to show true costs and value. Avoiding cross-subsidisation, means all consumers will pay the fair and appropriate price (whether indirect or directly), including the end consumer. Finally, experience and service level guarantees are an important indicator of quality and consistency of service." 	<p>The Agency welcomes the proposal from GTS, finding that its proposal is already captured by the governance criteria 27 and 40 in the Agency's list of "other criteria".</p> <p>The Agency sees the proposal of FGSZ - to have also the user interface in multiple languages (at least English) - relevant, as it is not in contradiction with the respondents' request for an English-speaking helpdesk.</p> <p>On the WINGAS proposals on economies of scale of platforms and of related shipper back-end costs, and the idea of having a single platform for Europe, the Agency would add that the current landscape of competing platforms has also benefits. It allows a greater diversity of booking platform services, which the legislator considered a competitive business.</p> <p>The proposal of National Grid brings forth the important principle of fair competition "at arms' length". The Agency agrees that cost transparency is important especially to ensure no cross-subsidisation from regulated activities to competitive activities without impeding the right of any party (including TSOs) to engage in the activity of offering booking platform services.</p>

3 The Agency concludes its evaluation of the consultation responses

The Agency views the received responses to the public consultation on the booking platforms as one of several pieces of information that support the Agency in the decision-making process to select single booking platforms for the IPs “Mallnow” and “GCP VIP” to be used by the TSOs at either side of the border. The Agency furthermore highlights that it makes its own independent analysis of the booking platforms giving due consideration to the stakeholder views expressed in the consultation and other information collected throughout its proceedings.

The Agency evaluates the responses as follows.

With respect to the “Compliance” criteria:

- The respondents acknowledge the list of EU legal requirements 1-17 pointing out a few possible occurrences of incompliance by one or more booking platforms.
- The respondents acknowledge the list of German national requirements (18-19, 21) and propose to include also the offering of specific capacity products defined in the German gas law, which the Agency accepts based on the legal justification provided.
- Two respondents disputed that the Polish national requirement of AS4/Edig@s applies to booking platforms. The Agency finds that the Polish national requirement (20) refers to communication with the TSO, but does not explicitly impose the requirement on the booking platform’s communication with platform users. Therefore, the Agency will rely on the Article 5(2) of CAM NC that foresees relevant communication processes between the booking platform and network users. In this respect, the CNOT table³ published by ENTSOG will be used as benchmark for the communication protocols verified by the Agency.
- The Agency welcomes the proposal by a respondent to consider fair pricing of the platform services and adds the avoidance of cross-subsidisation to the list of EU legal requirements per Article 13 of Regulation (EC) 715/2009.

With respect to the “Other criteria”:

- The respondents marked the majority of other criteria (21-42) as relevant (Table 7) and provided an indication of the relative importance of the criteria by giving points to the different criteria (Table 8).
- Based on the scores, the Agency distinguishes three main categories of priority quality criteria (receiving a total score of 147 points), these are:
 - “security” (criteria 23-24, 26 and 39) receiving 62.5 points (about 40%),
 - “governance” (criteria 27 and 40) receiving 43 points (about 30%),
 - and “user friendliness” (criteria 29, 36-37) receiving 41.5 points (about 30%).
- A fourth group of priority criteria is “fair pricing” (criteria 34-35, 41) which received 45 points.
- The Agency considers the score of 16.5 point for criterion 42 distorted as it is the result of an outlier score given by one respondent (giving a score of 8 compared to other respondents giving not more than 1 point). All other criteria received scores of less than 10 points, indicating that these services and functionalities have a lower priority for the platform users.
- In view of the present assessment of consultation information, the Agency sees fit to evaluate booking platforms with respect to “other criteria” on the price, on the one hand, and on the quality elements of governance, security and user friendliness, on the other hand. The latter elements with relative weights of 30% for governance, 40% for security and 30% for user friendliness.

³ https://entsog.eu/public/uploads/files/as4/2018/INT0994-161026%20Common%20Data%20Exchange%20Solution%20Table_final.pdf

The Agency will use this information to assess the booking platforms that submitted their offer to provide services for the concerned IPs. All responses have been published online on 22/08/2018 on the website of the Agency (https://www.acer.europa.eu/Official_documents/Public_consultations/Pages/PC_2018_G_03.aspx).

Annex I – List of respondents and their platform use

1. Axpo Trading AG (“Axpo”)
2. EDF Trading Limited (“EDF”)
3. Enagás S.A. (“Enagás”)
4. Eni S.p.A (“Eni”)
5. Fluxys TENP GmbH and Fluxys Deutschland GmbH (“Fluxys”)
6. Grupa Azoty SA (“GA”)
7. Grupa Azoty Zakłady Azotowe PUŁAWY S.A. (“PUŁAWY”)
8. GASCADE Gastransport GmbH (“GASCADE”)
9. Gazprom export LLC (“Gazprom export”)
10. Gazprom Marketing & Trading Limited (“GMT”)
11. GRTgaz Deutschland GmbH (“GRTgaz”)
12. Gasunie Transport Services B.V. (“GTS”)
13. Handen Sp. z o.o. (“Handen”)
14. Hermes Energy Group S.A. (“HEG”)
15. NET4GAS, s.r.o (“NET4GAS”)
16. ONTRAS Gastransport GmbH (“ONTRAS”)
17. Polskie Górnictwo Naftowe i Gazownictwo SA (“PGNiG”)
18. Polish Confederation lewiatan
19. PKN ORLEN SA (“PKN ORLEN”)
20. FGSZ Ltd (“FGSZ”)
21. Shell Energy Europe Limited (“Shell”)
22. Thyssengas GmbH (“Thyssengas”)
23. Towarzystwie Obrotu Energią (“TOE”)
24. TAURON Polska Energia S.A. (“TAURON”)
25. Uniper Global Commodities SE (“Uniper”)
26. Vattenfall Energy Trading GmbH (“Vattenfall”)
27. VNG Handel & Vertrieb GmbH (“VNG”)
28. WINGAS GmbH (“WINGAS”)
29. National Grid

Outside consultation period

30. EFET

Table 5. Respondents' platform use - (not included for not using the consultation template: Lewiatan, National Grid and Net4Gas)

	GSA	PRISMA	RBP
Axpo	x	x	x
EDF	x	x	
Enagás S		x	
Eni		x	
Fluxys		x	
GA	x		
PUŁAWY	x		
GASCADE		x	
Gazprom export	x	x	x
GMT		x	
GRTgaz		x	
GTS		x	
Handen	x		
HEG	x	x	
ONTRAS		x	
PGNiG	x	x	
PKN ORLEN	x	x	
FGSZ			x
Shell	x	x	
Thyssengas		x	
TOE	x	x	
TAURON	x	x	
Uniper	x	x	x
Vattenfall	x	x	
VNG		x	
WINGAS GmbH		x	x

Annex II - Compliance

Table 6. Compliance criteria and number of reported (potential) non-compliance by consultation respondents

No	Related to regulation (CAM, CMP, REMIT)	Description of criteria	Claimed non-compliance GSA	Claimed non-compliance PRISMA	Claimed non-compliance RBP
1	Allocation of firm capacity	The allocation of firm capacity products via auction –CAM NC Article 8	0	0	0
2	Allocation of interruptible capacity	The allocation of interruptible capacity products via auction –CAM NC Article 32	1	0	0
3	Bundling of capacity products	Automated bundling of two capacity products on the same IP –CAM NC Articles 19 and 21	2	0	0
4	Ascending clock auctions (yearly, quarterly and monthly)	The creation and holding of auctions for long term products in accordance –CAM NC Article 17	0	0	0
5	Uniform price auctions (day-ahead, within-day)	The creation and holding of auctions for short term products in accordance –CAM NC Article 18	1	0	0
6	Day-ahead bid roll-over	The automatic rollover of valid, unsuccessful bids from day-ahead to within-day –CAM NC Article 15 par 10	1	0	1
7	Support of kWh/h and kWh/d as capacity unit	The available energy units used to express capacity –CAM NC Article 10	2	1	0
8	Secondary capacity trading	Functionality to offer and make an offer for secondary capacity –CAM NC Article 27.2, para C	1	0	0
9	Automated bidding	Functionality to automatically enter bids against any price step within an ascending clock auction –CAM NC Article 17.6	1	0	0
10	Reporting of platform transactions (bidders and public)	Publication of auction results in according with CAM NC publication times –CAM NC Articles 11(10)-(11), 12(9)-(10), 13(8)-(9), 14(9)-(10), and 15(12)-(13)	0	0	0
11	Bundling of capacity on 1:n situations	Art 3(5); Art 8(2); Art 27(2)(a) CAM NC	1	1	0
12	Offer of competing capacity products	Functionality to cater for capacity that can only be allocated by reducing related capacity in a separate auction –Art 3(5) CAM NC	0	0	0
13	Allocation of incremental capacity	The allocation of incremental capacity via auction -CAM NC Article 29	1	0	0

No	Related to regulation (CAM, CMP, REMIT)	Description of criteria	Claimed incompliance GSA	Claimed incompliance PRISMA	Claimed incompliance RBP
14	Surrender of capacity	Functionality for network users to surrender capacity won from a previous auction	0	0	1
15	Buyback of capacity	Functionality for TSOs to buy back capacity sold in a previous auction	0	0	0
16	REMIT reporting obligations	Likelihood of compliance with ability to report data required for REMIT	0	0	0
17	Interoperability and data exchange obligations	Commission Regulation (EU) 2015/703, CAM NC Article 7	0	0	0
	National requirements	Description of criteria			
18	Assignment to balancing groups	BNetzA decision BK7-14-020 implementing (BAL NC) and CAM NC	2	0	1
19	Support for capacity upgrade services	Pursuant to § 13 Abs. 2 GasNZV	1	0	2
20	Use of protocol AS4 and data format Edig@s-XML	Required by Polish TSO pursuant to the national Transmission Network Code	0	9	1
21	Anonymity of all trading procedures	Pursuant to § 12 (3) 2 GasNZV	0	0	0

Annex III – Other criteria

Table 7. Overview of relevance of other criteria (number of respondents marking a criterion as relevant, out of 26 respondents)

	IT-related / user-friendliness / additional criteria	Description of criteria	Criterion rated as “relevant” by x respondents
21	Authorisation level management	Functionality to manage levels of user access and permissions	23
23	Secure platform access for network users	Data security protocols in place for network user access	23
24	Peak service load	IT Infrastructure capacity available and used, and scalability of IT infrastructure to deal with a high amount of transactions, users, etc.	23
29	Graphical user interface of the platform	Usability of web front end of the platform	23
37	Helpdesk availability in English	Support available in EN	23
36	Helpdesk availability outside business hours	Technical and business support available 24/7	22
39	Measures for data security and confidentiality, preservation of data	Adequacy of data management practices	22
40	User input in platform development	Presence of a body for collecting/ assessing (non-binding) input of platform users (e.g. advisory board or similar governance instrument)	21
26	Data backup and security	Data backup, data retention and data security processes, standards and policies	20
27	Continuing development (EU / national regulations)	Level of planned future development of platform	20
28	Shipper and user registration on the platform	Registration process for network users	20
32	Multi-currency booking	Level of support for multiple currencies within platform	20
42	Capacity conversion service	Service for network users holding mismatched unbundled capacity -CAM NC 21(3) (<i>the implementation may be facilitated by the capacity booking platforms</i>)	20
25	(Financial) insurances taken up to cover disruptions	Insurance to cover platform's liability of lost revenue of platform users through platform failure	18
30	Options for connection to the platform	Options (GUI, web services) available for network users to access and utilize the platform e.g. submitting bids	18
31	TSO and shipper automated communication	Level of support for automated connections to the platform through web services	18
34	(efficient) Cost reflective fees	Alignment of platform usage fees to total operating cost (TSOs, users)	18
33	Credit limit check	Functionality to set and enforce network user credit limits (check solvency of network users)	17
22	Network point display and administration	Functionality to create and manage network points by TSOs	15
35	Cost transparency for TSOs	Level of transparency of charging structures used to charge TSOs	15
41	Price-effects / Transport tariff-effects	How end-users tariffs are affected by the costs / choice of the platform (TSO back-end costs and platform service costs)	14
38	Helpdesk availability in other languages	Support available in other language	5

Table 8. Points awarded by respondents for importance of “other criteria”

	IT-related / User-friendliness / additional criteria	Importance of criterion (total points awarded by respondents)
23	Secure platform access for network users	25.5
40	User input in platform development	22
27	Continuing development (EU / national regulations)	21
41	Price-effects / Transport tariff-effects	21
42	Capacity conversion service	16.5
24	Peak service load	16
29	Graphical user interface of the platform	15.5
36	Helpdesk availability outside business hours	14.5
34	(efficient) Cost reflective fees	14
37	Helpdesk availability in English	11.5
39	Measures for data security and confidentiality, preservation of data	11
26	Data backup and security	10
35	Cost transparency for TSOs	10
30	Options for connection to the platform	7
33	Credit limit check	6
25	(Financial) insurances taken up to cover disruptions	4
28	Shipper and user registration on the platform	4
31	TSO and shipper automated communication	4
21	Authorisation level management	3
32	Multi-currency booking	2
22	Network point display and administration	0
38	Helpdesk availability in other languages	0

The Agency ranked the top six criteria separately for network users and TSOs in the two tables below:

Table 9. Top 6 criteria for respondents who are network users

Top 6 criteria for network users	Points awarded by network users
Price-effects / Transport tariff-effects	15
Graphical user interface of the platform	12.5
Secure platform access for network users	11.5
Helpdesk availability outside business hours	11.5
Helpdesk availability in English	11.5
(efficient) Cost reflective fees	11

Table 10. Top 6 criteria for respondents who are TSOs

Top 6 criteria for TSOs	Points awarded by TSOs
User input in platform development	19
Continuing development (EU / national regulations)	16
Capacity conversion service*	15
Secure platform access for network users	13
Measures for data security and confidentiality, preservation of data	10
Peak service load	7

*One respondent awarded 8 points to this criterion which is an outlier (8 other respondents gave a score of 1 point and 1 respondent gave a half point)

Table 11. Evaluation by respondents of performance of the 3 booking platforms for “other criteria” 21-42 (scoring system 1: poor; 2: ok; 3: excellent);
Italic: average score below 2

	IT-related / User-friendliness / additional criteria	Average performance rating for for GSA	Average performance rating for for PRISMA	Average performance rating for for RBP
21	Authorisation level management	2.3	2.7	3.0
22	Network point display and administration	2.4	2.6	3.0
23	Secure platform access for network users	2.4	2.9	2.5
24	Peak service load	2.3	2.5	2.3
25	(Financial) insurances taken up to cover disruptions	2.4	2.5	3.0
26	Data backup and security	2.7	2.6	2.5
27	Continuing development (EU / national regulations)	2.0	2.6	2.0
28	Shipper and user registration on the platform	2.4	2.7	2.5
29	Graphical user interface of the platform	2.7	2.6	2.5
30	Options for connection to the platform	2.2	2.6	2.3
31	TSO and shipper automated communication	2.3	2.5	2.0
32	Multi-currency booking	2.2	2.5	2.0
33	Credit limit check	1.8	2.3	3.0
34	(efficient) Cost reflective fees	2.6	2.2	3.0
35	Cost transparency for TSOs	2.6	2.5	3.0
36	Helpdesk availability outside business hours	2.0	2.6	2.0
37	Helpdesk availability in English	2.2	2.7	1.8
38	Helpdesk availability in other languages	2.5	2.5	2.0
39	Measures for data security and confidentiality, preservation of data	2.4	2.7	2.0
40	User input in platform development	2.0	2.6	2.0
41	Price-effects / Transport tariff-effects	2.8	1.8	3.0
42	Capacity conversion service	1.7	2.9	1.7