

26/05/2020

Gas Market Code and Information Exchange Guidelines

Version 1.7

26.5.2020

Version history

Version	Date	Change
1.2	28.6.2019	First English version. The guidelines will be updated as progress is made in technical implementation.
1.3	4.9.2019	Added recommendation for DSOs to upload Metering Site data by 2nd Oct 2019, clarifications on opening of the Portal, no-later-than deadline for basic data upload in Data Hub, description of Data Hub demo environment and mentioning of Retailers' biogas data exchange. Changed the date of opening the Submission of Notifications of Market Participant Relationships 3 Oct -> 15 Oct and as-of date, when TSO is able to sign and return the framework agreements 1 Sep -> September 2019.
1.4	13.9.2019	Added TSO's postal address for sending the signed agreements
1.5	3.10.2019	Added definition for the bank account mentioned in the creditworthiness chapter of the framework agreements
1.6	15.4.2020	References regarding the transfer to a new market model removed. Lists on relevant documents and links added. Links and formatting updated. Capacity booking correction principles and manual procedures for wholesale market data exchange added.
1.7	26.5.2020	Added description of the first correction round of balance errors and related invoicing

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1 Introduction

The Gas Market Code and Information Exchange Guidelines supplement the Finnish Gas Market rules that came into force on January 1, 2020.

The Gas Market Code and Information Exchange Guidelines have been developed for shippers, traders, transmission network end users, biogas injector, distribution system operators (DSOs) and retailers to further specify recommendations related to procedures and requirements and instructions relating to the exchange of information.

The latest version of the Gas Market Code of Conduct and Information Exchange Guidelines is available on the Transmission System Operator with System Responsibility's [website](#).

1.1 Definitions

The definitions provided in the Gas Transmission Rules, Gas Distribution Rules and Biogas Rules in their up-to-date versions shall be in force in this document.

In this document, the term TSO is used to refer to the Transmission Operator with System Responsibility.

1.2 Other relevant documents

The following documents are available on Gasgrid Finland's [website](#). For documents only available in Finnish, please see the Finnish webpages.

Gas Transmission Rules	Finnish gas market rules for market participants operating in the market roles of shipper and trader.
Biogas Rules (Biokaasun säännöt)	Finnish gas market rules for biogas injectors. Available in Finnish only.
Gas Distribution Rules	Finnish gas market rules for DSOs. Available in Finnish only.
Edig@s XML 5.1 guideline for Finland	Describes the contents of nomination, trade notification and confirmation documents exchanged between shippers, traders and the TSO with Edig@s XML 5.1.
Gasgrid Portal user instructions	Describes the main functionalities of the portal and contains instructions for users.
GasDatahub user instructions	Describes the main functionalities of the Datahub and contains instructions for users.
Gas metering recommendations	Describes the technical requirements for sending metering information. Available in Finnish only.

1.3 Links

TSO's website	https://gasgrid.fi/en/gasgrid-finland-en/
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TSO's Portal	https://gasgridportal.fi/
GasDatahub (KaTSO)	https://katso.azurewebsites.net/Kirjaudu?ReturnUrl=%2F#
Registering as a market participant and the bank guarantee template	https://gasgrid.fi/en/registration-as-market-participant/
Electronic registration form	https://gasgridportal.fi/register
Market rules and recommendations	https://gasgrid.fi/en/gas-market/market-rules-and-recommendations/
Further information on technical requirements for sending metering information	https://gasgrid.fi/en/our-services/other-services%e2%80%8b/
Manual data exchange forms (xlsx) for shippers and traders. To be used only in case TSO's market data exchange systems are down (see chapter 5.2).	https://gasgrid.fi/wp-content/uploads/Gasgrid-Finlands-forms-for-manual-data-exchange-version-1.0.xlsx

2 Registering as a market participant

Market participants are the relevant shippers, traders, transmission network end users, biogas injectors and retailers. Distribution system operators (DSOs) shall also register with the TSO as per the registration process below.

2.1 TSO's postal address for signed agreements

Gasgrid Finland Oy
 Janne Grönlund
 Kiehuvantie 189,
 FI-45100 Kouvola
 Finland

2.2

Registration process

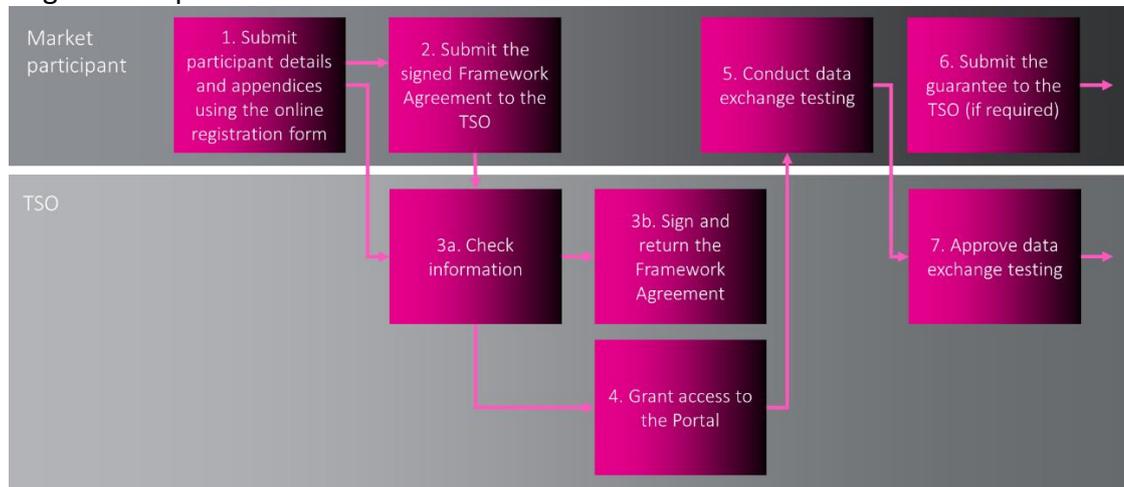


Figure 1. Market participant registration process

1. *Submit participant details and appendices using the online registration form*

- **Market participants** shall provide their master data to the TSO by filling in the [electronic registration form](#) on the TSO’s website. Should the market participant register as a shipper or trader, the participant shall also provide an extract from the Trade Register (or a corresponding national document if the company is not registered in Finland) that is a maximum of three months old, as well as the company's latest financial statement (if available).
- **DSOs** shall provide their master data by filling in the [electronic registration form](#) on the TSO’s website.

2. *Submit the signed Framework Agreement to the TSO*

- **Market participants** shall provide two signed hardcopies of the original market role-specific Framework Agreement. The market participant may submit several Framework Agreements should they wish to register in multiple market roles. Signed agreements are to be sent to the address detailed in section 2.1.
- **DSOs** shall send two signed hardcopies of the original Cooperation Agreement with the TSO to the address detailed in section 2.1.

3. *The TSO checks the agreement and then signs and returns the agreement*

- Upon receipt of the agreements, the TSO signs the documentation and returns one original counter-signed copy to the registering participant within two weeks provided that the participant has submitted all other required information and documents. Documents are sent to the address provided by the participant upon registration.

4. *Grant access to the Portal*

- The TSO provides the participant with a user ID and access to the TSO's [Portal](#). Access details are sent to the email address provided by the participant upon registration.

5. *Conduct data exchange testing*

- The scope of the data exchange can be agreed with the TSO.

6. *Submit the guarantee to the TSO (if required)*

- **Transmission network end users** (excluding users registered with the Tax Administration¹) and **DSOs** shall provide the TSO with a sufficient guarantee. This is required for commercial operations to begin and is in accordance with the market participants' Framework Agreements and DSOs' Cooperation Agreements. The guarantee shall be equal to the participant's largest monthly invoice for natural gas taxes and strategic stockpile fees sent within the past 12 months, extending on a sliding scale to taxes and strategic stockpile fees paid by the market participant in 2019.
- **Shippers and traders** shall provide the TSO with a sufficient guarantee. This is in accordance with the Framework Agreements with the TSO and is required for shippers to order capacity, and for shippers and traders to operate as balance responsible parties. At any given point in time, the guarantee shall be equal to the participant's largest monthly capacity invoice sent in the past 12 months multiplied by three. In applying this guarantee requirement, shippers registering as market participants from August 1, 2019 onwards shall be seen as new operators without previous capacity agreements.
- **Balance responsible shippers or traders** shall provide the TSO a security which at any given time covers the balance responsible party's imbalance charge invoices, and the estimated imbalance charges (which have not yet been invoiced), including a 10% security margin for monthly fluctuation in imbalance charges. In applying this guarantee requirement, shippers and traders registering as balance responsible parties from August 1, 2019 onwards shall be seen as new operators.
- As per agreements between the TSO and participants, the TSO shall accept on-demand guarantees of an A-rated (Moody's or Standard & Poors) financial institution registered in an EU Member State and the participant's cash deposits into a bank account designated by the TSO. This bank account shall be a guarantee deposit account of an A-rated (Moody's or Standard & Poors) financial institution registered in an EU Member State for which the pledge agreement of the cash deposit on the guarantee account shall be submitted to the TSO.
- It is recommended that participants use the Bank Guarantee Agreement template available on the TSO's [website](#).

¹Transmission network end users who have applied for the status of registered user with the Tax Administration do not need to provide the Transmission System Operator with System Responsibility with security.

7. *Data exchange testing is approved (if required)*

3 Participant identifiers

For information exchange with the TSO, a market participant requires a participant identifier. The identifier(s) shall be provided by the party when they register as a market participant (as per the process detailed in section 2.2).

A company may use both the Energy Identification Code (EIC) and one or multiple Global Location Numbers (GLN) to operate in different market roles. However, only one participant identifier shall be used for each market role, and the same participant identifier may not be used for multiple market roles. Participant identifiers shall be notified to the TSO when registering as a market participant.

The requirements and guidelines for participant identifiers are provided below.

3.1 Shipper and trader participant identifiers

Shippers and traders shall use a European Identification Code (EIC) as their participant identifier. This shall be a “party code” i.e. an EIC X code, which identifies an organization or legal entity that actively trades within the Internal European Energy Market. If the same market participant (same taxable entity) has an EIC X code for the electricity market, that code shall also be used in the gas market.

The EIC scheme is managed by the European Network of Transmission System Operators for Electricity (ENTSO-E) for the harmonization and implementation of standardized electronic data interchanges. In Finland, EIC codes are issued by Fingrid for the electricity market and by Gasgrid Finland for the gas market. More information on requesting an EIC X code can be found on the TSO’s [website](#).

3.2 Distribution system operator and retailer participant identifiers

Retailers and DSOs shall use a GS1 Global Location Number (GLN) as their participant identifier. The participant may select the length of their GS1 company prefix (7, 9, 10 or 11). If the same participant (same taxable entity) acts in multiple market roles (e.g. as a distribution system operator and as a retailer), they shall use the same GLN company prefix, but a different running consecutive number for each market role.

When registering as a market participant, the participant shall provide their GLN to the TSO, who will accept the identifier and make this available to other participants. Participants acting in multiple market roles shall notify which GLN corresponds to which market role.

The GS1 company prefix can be requested from GS1-Finland (<https://www.gs1.fi/en/our-services/become-a-customer>).

3.3 Transmission network end user and biogas injector participant identifiers

The TSO shall determine the participant identifiers for transmission network end users and biogas injectors.

4 Metering site identifiers and measurement areas

4.1 Transmission network metering site identifier

The TSO shall determine national metering site identifiers for transmission network end user metering sites and biogas entry points connected to the transmission network. The Global Service Relationship Number (GSRN) registered by the DSO in question in the metering site register shall be used for biogas entry points connected to the distribution network. Transmission network end users and biogas injectors can check their metering site identifiers on the TSO's [Portal](#).

4.2 Distribution Network Metering Site identifier

Distribution network metering sites and biogas entry points connected to a distribution network shall have a GS1 Global Service Relationship Number (GSRN).

The GSRN consists of the GS1 Company Prefix, Service Reference and Check Digit and is generally 18 digits long. The length of the Service Reference depends on the length of the GS1 Company Prefix. The GS1 system of standards does not have any restrictions on the use of the service reference or on the determination of its individual digits. Enterprises may determine the service reference freely provided that all identifiers are unique.

The GSRN must remain effective for the entire life cycle of the distribution network metering site or biogas entry point.

4.3 Measurement areas

Network identifiers are not required for distribution networks. Each distribution network forms one or multiple measurement areas in accordance with the principles below:

a) Distribution network (no biogas entry point connection)

The distribution network forms one measurement area for which the calorific value of the transition point between the transmission network and the distribution network is used. The residual consumption gas quantity for the distribution network shall be calculated by deducting the metered gas quantities of the daily metered sites of the distribution network in question, from the volumes of metered gas at the transition point between the transmission network and the distribution network. The gas quantities are converted into energies by multiplying them by the calorific values of the transition point between the transmission network and the distribution network.

b) Distribution network (with biogas entry point connection)

The DSO is responsible for the division of the distribution network metering sites into one or multiple measurement areas and determines the calorific values for each measurement area. The residual consumption gas quantities for the distribution network are calculated by summing the gas quantity at the transition point between the transmission network and the distribution network, multiplying this with the calorific value of the transition point and the metered gas quantity at the biogas entry point, multiplied by the calorific value of the biogas entry point, and by deducting from this sum the metered gas quantity of the distribution network's daily metered

sites, which is converted into energies using the calorific value of the measurement areas of each metering site.

- c) *Two distribution networks form a "circular" network (i.e. the distribution networks can be physically connected and both networks have a connection to the transmission network)*

In a balance settlement, the gas quantities at the transition point between the two distribution networks are added together, assuming that the same calorific value can be used for the transition point and all metering sites. The distribution network's residual consumption gas quantity are calculated as a single network, i.e. the metered gas quantities of both networks' daily metered sites are deducted from the sum of the transition point measurements between the transmission network and the distribution network. The energy quantities are obtained by multiplying the gas quantities with the calorific value of the transition points.

- d) *Two distribution networks form a "chain" (i.e. there is a distribution network transition point between the distribution networks and only one networks is connected to the transmission network)*

In a balance settlement, the gas quantities are determined for the distribution network that is connected to the transmission network by deducting the metered amount of gas at the transition point between the distribution networks from the transition point measurement between the transmission network and the distribution network. The residual consumption gas quantity of the distribution network connected to the transmission network is obtained by deducting the metered gas quantities of the daily metered sites of the distribution network in question from the amount of gas referred to above. The residual consumption gas quantity for the latter distribution network is calculated by deducting the metered gas quantities of the daily metered sites of the distribution network in question from the metered gas quantities at the transition point between the distribution networks. All gas quantities are converted into energies by using the calorific values at the transition point between the transmission network and the distribution network.

5 Wholesale market information exchange

Wholesale market information exchange is centralized and carried out on the TSO's Portal.

On the Portal, shippers and traders can, inter alia:

- update their master data;
- provide notification of Balance Group memberships, approve membership requests for their Balance Group and terminate Balance Group memberships;
- accept and terminate market participant relationships;
- order capacity (shippers only);
- submit trade notifications and nominations (shippers only);
- monitor their balance settlement account;
- monitor their capacity order status (shippers only);
- receive information and forecasts from the TSO;
- monitor the status of their system services, capacity and tax -related payments and compensations (upcoming feature)

Transmission network end users, retailers, biogas injectors and DSOs can, inter alia:

- update their master data;
- notify and terminate market participant relationships (for DSOs only when there are daily metered sites in the distribution network);
- monitor their measurement data (transmission network metering sites and biogas entry points, for DSOs only measurements at transition points between the transmission network and the distribution network);
- receive information and forecasts from the TSO;
- monitor the status of their tax-related payments (upcoming feature, does not apply to retailers and biogas injectors).

5.1 Electronic messages (shippers and traders)

Shippers and traders may use electronic messages (Edig@s XML version 5.1 and AS4 protocol) for nominations and trade notifications. To use electronic messages, shippers and traders must comply with the TSO's information exchange standards (i.e. the national application of the Edig@s specifications) and successfully pass the information exchange tests set by the TSO. The standards for trade notifications and nominations can be found on the TSO's [website](#).

5.2 Manual procedures

Manual procedures are to be used by shippers and traders only if the TSO's market data exchange systems are down. The notification of the use of manual data exchange procedures will be sent by email to Portal users' addresses by the TSO only. Shippers and traders may use the manual data exchange procedures only once the TSO has provided the notification. Similarly, once the TSO has given the notification to end the manual data exchange and to return to normal data exchange procedures, the TSO will no longer process manual notifications. [Excel forms](#) are to be used in the manual mode (each form is located on its own sheet in the same [file](#)):

- Capacity booking
- Nominations, renominations and trade notifications
 - only for the current gas day and the next gas day are taken in the manual mode
 - in the manual mode the lead time is extended by one hour (e.g. for the Balticconnector the normal lead time for renominations to take effect is 2 hours, in the manual mode it is 3 hours)
- Capacity rights transfer
 - only notifications concerning periods starting on the next gas day are taken in the manual mode

Filled [forms](#) are to be sent to commercial@gasgrid.fi

It is recommended that forms are sent as early as possible before the deadlines to ease the manual processing at the TSO's end.

5.3 Corrections of capacity bookings

In the case that a shipper makes an error in its capacity booking:

- i) **The preferred and primary** means by which to fix the error is to contact the TSO **before** the capacity booking is accepted by the TSO. The TSO processes the bookings within one hour of submission. In case of an error, the shipper should call the TSO's dispatch center (the number is available on the capacity booking page of the Portal) **and** send an email (commercial@gasgrid.fi) proving the booking in question was undoubtedly a mistake.
- ii) **The secondary** means by which to fix the error (only where option 1 is not possible) is to contact the TSO as soon as possible, but **before** the capacity booking window for that product is closed. The shipper should call the TSO's dispatch center (the number is available on the capacity booking page of the Portal) **and** send an email (commercial@gasgrid.fi) proving the booking in question was undoubtedly a mistake.
- iii) **The least preferred** means by which to fix the error (only where options 1 and 2 are not possible) is after the booking window is closed. The shipper should notify the TSO within a reasonable timeframe (but no later than the final balance settlement M+6 is made). If the shipper can prove that the booking in question was undoubtedly an error and it has had no effect on the market, TSO can make the correction either by:
 - (1) removing the capacity booking from the TSO's systems (concerns day and within-day products)
 - This may result in capacity overrun charge for those days (1,5 times the unit price based on intraday firm capacity)
 - or by
 - (2) correcting the capacity booking in the TSO's systems (concerns products longer than daily products)

In all cases the burden of proof is on the shipper who must prove the capacity booking was an error to allow the TSO to be able to make the correction. After agreeing on the correction, the TSO will make the correction in the IT-systems before the next invoicing period. If the shipper fails to prove that its booking was undoubtedly an error, the TSO will not modify or cancel the booking and it will be invoiced in its entirety.

6 Retail market information exchange

Under the Natural Gas Market Act (587/2017 as amended), the TSO is responsible for providing centralized information exchange in the gas retail market. Electronic messages are not used in the retail market.

The TSO maintains the Register of Metering Sites for the retail market on the [GasDatahub \(KaTSO\)](#). DSOs and retailers are responsible for updating data in the Register of Metering Sites. Metering site

register data for all except kitchen cooker customers shall be managed in the Register of Metering Sites.

DSOs shall submit measurement data from all daily metered sites to the GasDatahub in accordance with the balance settlement schedule. This data is used to calculate energy quantities to enable site-specific invoicing for retailers, DSOs and biogas entry point injectors connected to distribution networks. The GasDatahub is also used to provide shipper-specific sum data for the balance settlement of the entire system.

Technical requirements for the sending of metering information are provided on the TSO's [website](#). Instructions for retrieving balance settlement information can be found in the [GasDatahub user instructions](#), as well as in the GasDatahub's swagger API interface description (available on the GasDatahub to registered users).

The technical guidelines for the GasDatahub are available for market participants on the TSO's [Portal](#). The technical guidelines for the GasDatahub are provided by the following documents:

- Centralized information exchange interfaces for the gas retail market (currently only available in Finnish)
- GasDatahub user guidelines for retailers, distribution system operators and biogas injectors (if connected to the distribution network)

Only pre-agreed IP addresses can be connected to the GasDatahub's REST API interface.

6.1 Balancing period and its impact on measurement and invoicing

The retail market balancing period is the Gas Day, which starts at 7:00 a.m. EET (Finnish time) and ends the following day at 7:00 a.m. EET. Thereby moves, disconnections and seller changes become effective as of 7:00 a.m. EET on their first effective date. Correspondingly, they are no longer effective as of 7:00 a.m. EET on the calendar day following their last effective date. The invoicing period is the Gas Month, which starts at 7:00 a.m. EET on the first day of the calendar month and ends at 7:00 a.m. EET on the first day of the following calendar month.

Distribution system operators shall provide the TSO with either hour- or day-specific measurements from all daily metered sites depending on the types of measurement time series available at the metering sites. The TSO shall convert the day-specific time series into hours by dividing the day-specific values by 24 hours. Hourly profiles are not used for the conversion. For the balance settlement, it is crucial to keep the time of reading as constant as possible so that the consumption always covers 24 hours (or 23 or 25 hours when converting to summer time and daylight saving time respectively). Therefore, the reading of day-specific measurements does not necessarily need to take place precisely after 7:00 a.m. EET.

6.2 Determining consumption at non-daily metered sites

DSOs are responsible for: reading the metering data of their respective distribution network's non-daily metered sites; processing and registering metering data; conversions into energies; and submitting data to the retailer with delivery obligation. The distribution network's retailer with delivery obligation shall agree with the DSO on how data is exchanged between the parties. The DSO and the retailer with

delivery obligation may agree on how the DSO delivers the metering site specific consumption estimates to the retailer with delivery obligation, as well as how it delivers the reconciliation results used to correct the difference between the estimated consumption and the measured consumption at the metering site.

6.3 Data exchange regarding retailing of biogas

Retailers are obliged to report metering site specific biogas consumption to the DSO on a monthly basis, so that the DSO is able to invoice natural gas related taxes and security of supply fees from the distribution network end users. Biogas consumption data is not maintained in the GasDatahub.

7 First correction round of balance errors and related invoicing

7.1 General

In the Gas Transmission Rules it has been stated that the TSO performs Balance Error Corrections according to defined timetable.

After the final balance statement, the need for corrections may be caused, for example, by errors in the TSO or DSO measurements during the final balance statement or by missing / incorrect shipper information at the gas supply site.

If the TSO measurement has been incorrect during the final balance statement (end-use of the transmission network, city gate measurement, biogas supply to the transmission network) and only the time interval and the total amount is known (but not the exact profile) the corrected gas amount will be spread evenly on the time interval. Corrections of distribution network measurements are the responsibility of the DSO.

The fact that the amount of gas cannot be allocated taking into account hourly fluctuations has been taken into account in the unit prices of the invoices caused by the corrections. In the case of imbalance and capacity overrun, the customer will be charged at a lower price than what the charge would have been in connection with the initial balance settlement.

Gas amount corrections may consist of the following components:

- Imbalance
- Capacity overrun
- Commodity charge
- Excise tax

Gas Transmission Rules chapter 9.5 First and Second Correction

Balance errors between Shippers, Transmission Network End Users, Retailers, Biogas Injecting Parties and the Transmission System Operator with System Responsibility shall be corrected twice for each delivery month. The Transmission System Operator with System Responsibility shall carry out the First Correction round during the third Gas Month following the delivery month (for example, the First Correction calculation for December shall take place in March) and the Second Correction calculation in April of the following calendar year for all 12 delivery months of the preceding calendar year. After that, balance errors between Market Participants shall no longer be corrected otherwise than for exceptional reasons or under a bilateral agreement between Participants.

The Transmission System Operator with System Responsibility shall deliver the results of the correction calculations concerning balance errors (corrected balance calculation results on the basis of which a Participant can determine its balance errors) to the Market Participants for correction invoicing between them. The results of the final balance settlement shall not be amended as a result of correction calculations.

7.2

Imbalance

Affected market participant: Balance responsible party

Principle: Corrected allocations are compared to the original nominations. The change in the imbalance compared to the original imbalance is invoiced / credited.

The price to be used for the adjustment is determined according to the pricing of the month to be corrected as follows, depending on the change in the imbalance:

- Charge at a neutral gas price
 - o 0 → Negative
 - o Negative → More negative
- Compensation with a neutral gas price
 - o 0 → Positive
 - o Positive → More positive
- Compensation with Balance gas sell price
 - o Negative → Less negative
 - o Negative → 0
- Charge at a Balance gas buy price
 - o Positive → Less positive
 - o Positive → 0

Cases where the price to be used for the correction consists of two components:

- The imbalance was negative and becomes positive with the correction
 - o Negative → 0: Compensation at the selling price
 - o 0 → Positive: Compensation with a neutral gas price
- The original imbalance was positive and becomes negative with the correction

- o Positive → 0: Charge at purchase price
- o 0 → Negative: Charge with a neutral gas price

7.3 Capacity overrun (exit zone, biogas entry)

Market participant affected: Shipper

Principle: The corrected allocation is compared to the original capacity bookings. Invoices / credits for capacity overrun changes.

Price to be used for correction:

- Charge at the price of the yearly product
 - o The amounts are corrected upwards and the corrected quantities lead to capacity overrun
- Compensation at the price of capacity overrun charge
 - o Quantities are corrected downwards and based on the corrected quantities the customer gets less capacity overrun

7.4 Commodity charge

Market participant affected: Shipper

Principle: The corrected allocation is compared to the original allocation. Invoice / credit the change of allocation.

Price to be used for correction:

- The price of the commodity fee specified in the tariff:
 - o Compensation if the amount of gas transferred to the shipper decreases with the correction
 - o Charge if the amount of gas transferred to the shipper increases with the correction

7.5 Excise tax

Affected market participant: transmission system end user and distribution system operator

Principle: If the TSO measurement has shown at the time of the final balance settlement

- *Excess*, ie reduced amount of gas → Excise duties are compensated to the transmission system end user / distribution system operator according to the corrected amount of gas
- *Too little*, ie the amount of gas is corrected to be higher → The end user of the transmission network / distribution network operator is charged additional excise tax according to the corrected amount of gas

Price to be used for correction:

- Price defined for excise tax