

Dear Madam / Sir,

we suggest the following amendment in the Draft Network Code in the definition of 'DSO' (ANNEX 1 item 20) - in analogy to the wording in the definition of 'TSO' (item 55):

(20) "DSO" means a distribution system operator as defined in Article 2(6) of the Directive or the entity responsible for keeping the distribution network in balance in accordance with and to the extent defined under the applicable National Rules.

Explanation:

In the Austrian Gas Market Model a distinct entity for the distribution system called distribution area manager has the following responsibilities amongst others:

- book capacity to match the forecast capacity needs at the internal interconnection points from the transmission into the distribution network in the market area;

- handle nominations at the internal interconnection points into the distribution network in

accordance with the market rules;

- procure physical balancing energy in the distribution area mainly via the virtual trading point,

with the aim to minimise the need for physical balancing energy by efficiently deploying control energy;

- provide the system service (load/pressure control and pressure maintenance) by handling the

technical/physical balancing or by entering into relevant contracts with third parties;

prepare total load forecasts for the early detection of imbalances; ....

Furthermore, the DSOs have to send various informations and the necessary basic data to the distribution area manager to that it can draw up the SLP consumption forecasts.

The current wording of Article 43 of the Draft NC on Balancing could make the DSOs responsible to supply information to the TSO which the distribution area manager has already received and will be reported to the TSO anyway.

To avoid inefficiencies and to streamline reporting procedures, we ask you to change the definition of DSO as proposed above.

The Association of Gas- and District Heating Supply Companies (FGW) is the independent, legally commissioned representative for Austria's natural gas and district heat industries. FGW works together with its members to ensure that natural gas and district heat are used in Austria in an economical, safe and environmentally friendly manner.

Many thanks in advance.

Best regards,

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