Summary of the Public Consultation – FUNC issue "Missing harmonisation of interfaces on capacity platforms"

Contents

1. Functionality Process

The purpose of "The Functionality Process for Gas Network Codes" is to handle issues which are related to the way of working of the various Network Codes (NCs) and Guidelines (GLs) on gas transmission by involving stakeholders, National Regulatory Authorities and Transmission System Operators. The process is aimed at reaching proposal(s) for issue solution from ACER and ENTSOG on the cross-border, regional and European issues.

Within the Functionality Process, Stakeholders are provided a possibility to raise and discuss issues related to the NCs and GLs as well as being involved in elaboration on the proposal(s) for issue solution. This voluntary Functionality Process is not a substitute for a formal network code amendment procedure.

The prioritised/selected cross-border, regional and European issues are sent to the relevant ENTSOG Working Group and ACER Task Force for a joint development of the solutions.

2. Introduction of the reported issue:

Equinor ASA posted the following issue in the Gas Network Code Functionality Platform
http://www.gasncfunc.eu/

Following the process described here the reported issue was validated by ACER and ENTSOG as an issue which falls under the scope of the FUNC process and categorised as an "European issue".
Extract of the reported issue

Issue identification number: 01/2019 and 03/2019[1]
Reporting party name: Equinor ASA
The issue: Missing harmonisation of interfaces on capacity platforms
Abstract: Today there are 4 capacity platforms (Prisma, Gaz System, GBS (Gassco booking site) and a Hungarian platform). There is also more to come. In addition, TSOs are also running some capacity processes like overnomination and interruptible capacities via their own sites. In the common data exchange solutions table from ENTSOG it was decided that for capacity interactive data exchange should be used. In our opinion this have created a situation where some of the processes is harmonised but the data exchange and platforms are completely different. This makes it difficult for network users (Balancing Responsible Parties) to keep track of their capacity and to get an overview of options available for transporting the gas in Europe and also the cost involved to do so.
Who should act: ACER, ENTSOG
Suggested solution or action: Adjustment of implementation
Other suggestions: Edig@s should be implemented.

The above-mentioned FUNC issue required detailed information from the involved parties (Capacity Booking Platforms and their customers) which was shared at a stakeholder Workshop organised in September 2019, which included representatives of all Capacity Booking Platforms, ACER, EFET, and

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[1] The issue was posted twice on the Functionality Platform by two separate users. On 1 July 2020 the Functionality Platform was updated, and all the issues previously posted on the old Platform were given new issue numbers. Issue 01/2019 was previously named 470-19-05-15-1056 and issue 03/2019 was previously named 496-19-06-03-0926

several network users. As a conclusion of this workshop all parties agreed to have a public
consultation on this topic launched by ENTSOG and ACER. The aim was to gain an understanding of
having a
common format and protocol preference among the market participants to communicate with
Capacity Booking Platforms.
This consultation focuses on data exchange between *Auction Office* and *Registered Network Users* as
mentioned in the Common Data Exchange Solution Table.

The Public Consultation was launched on 8 January 2020 and was open for responses until 28 February
2020.
The participants of this consultation had the choice to keep anonymity not disclosing their company
names for the publication of the results, if they wished to do so. For this reason, some quotes below
do not include the company name.

3. Public Consultation – main findings

3.1. Participants

30 participants responded to the public consultation. The top three countries where the participating parties are located are Germany (7), Poland (7), and the United Kingdom (4).

The market roles indicated by the parties were Balancing Responsible Party (BRP) (15), System Operators (Transmission System Operators (TSO), LNG System Operators (LSO) and Storage System Operator (SSO)) (8), and Capacity Booking Platform Operators (CBPO) (3), while four parties indicated an "other" role than the ones available for selection such as "Shareholder", "Software and Service Provider", "Gas Seller", "Producer" and "Customer".

The role "Capacity Responsible Party" (CRP) was indicated by nine participants. As all CRPs indicated being active also as BRPs, all parties operating on Booking Platforms are also involved with Balancing and Nomination Processes in their roles as BRPs. For this reason, the role of CRPs was included in the numbers of BRPs.

One System Operator indicated having multiple roles (TSO, Capacity Booking Platform Operator (CBPO), SSO, Area Coordinator, Virtual Trading Point (VTP) Operator). The remaining System Operators indicated having only one role.

In order to have a better overview of the provided answers, two groups of market roles were established. Group A consists of the CBPOs and TSOs; Group B includes BRPs, LSOs, SSOs and "other roles".
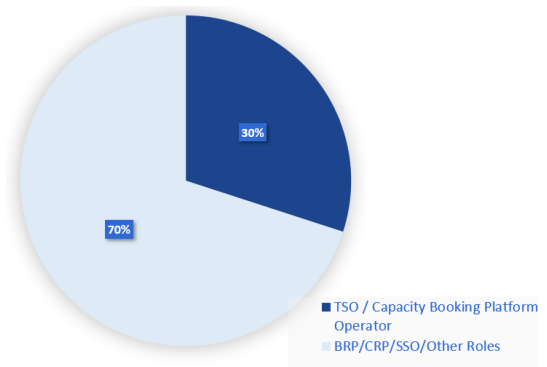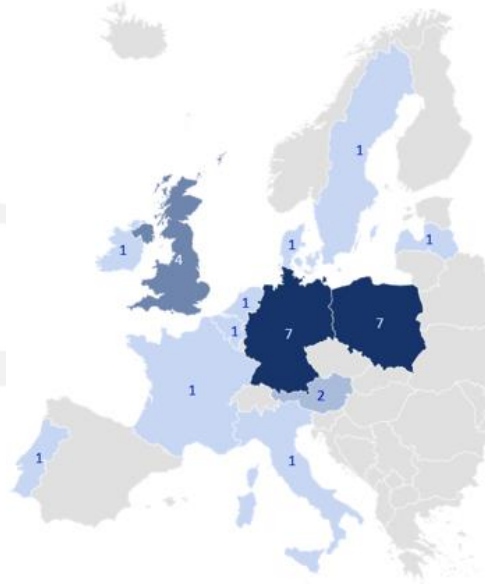
3.2. Currently used formats and protocols

The current situation across Europe regarding the used formats and protocols for communication to the questioned counterparties is displayed in the graphs below.

Formats: The most utilised format is Edig@s 5.1 followed by Edig@s 4 which are used to communicate with all counterparties but CBPOs. The most used format to communicate with a CBPO is a proprietary format (defined by one of the CBPOs) followed by Edig@s 5.1 and Edig@s 4.

The syntax of Edig@s called Edifact, which is no longer supported by the development team for Edig@s, since the introduction of Edig@s 5[2], is still widely used for communication to all counterparties.

The communication formats defined by the Interoperability and Data Exchange Network Code (INT & DE NC) or any national regulation are marked with a red outline below.
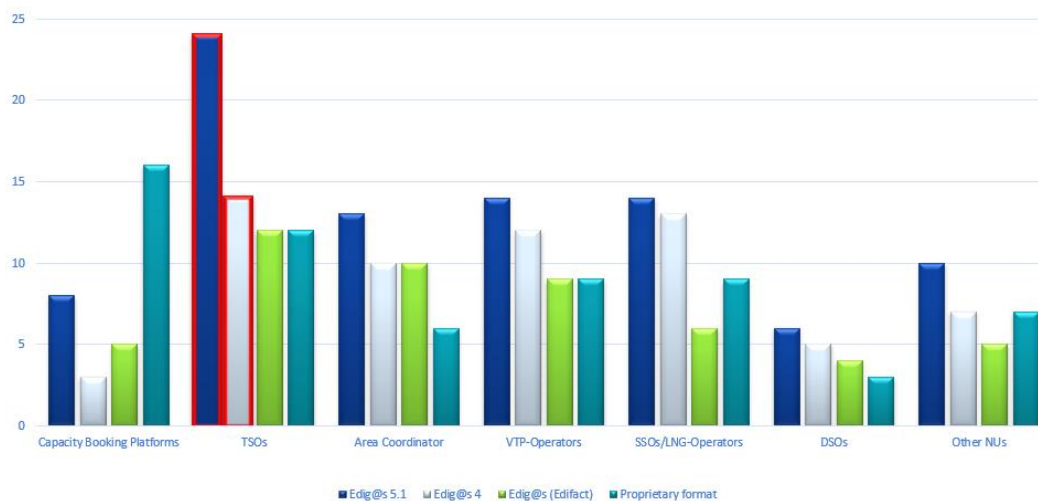
Protocols: AS4 was indicated as the most used protocol to communicate with all parties except CBPOs. The most used protocol to communicate with CBPOs is "web-services", which is widely used to communicate to TSOs. AS2 is the second most used protocol to communicate with Area Coordinators, VTP Operators, SSOs/LSOs, and other Network Users (NU).

The remaining protocols provided as an option in the public consultation (SFTP, FTPs, SMTP (email)) were summarised as "others" since they are not mentioned in the INT NC or considered sufficiently secure.[3]

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[2] Edig@s 4 supports the syntax Edifact and XML. Edig@s 5.1 supports only XML as a syntax. The INT & DE NC obliges the usage of Edig@s XML which means Edig@s 4 XML or Edig@s 5.1.

[3] Due to the message encryption, AS2 provides security in terms of non-repudiation but is not mentioned in the INT NC.
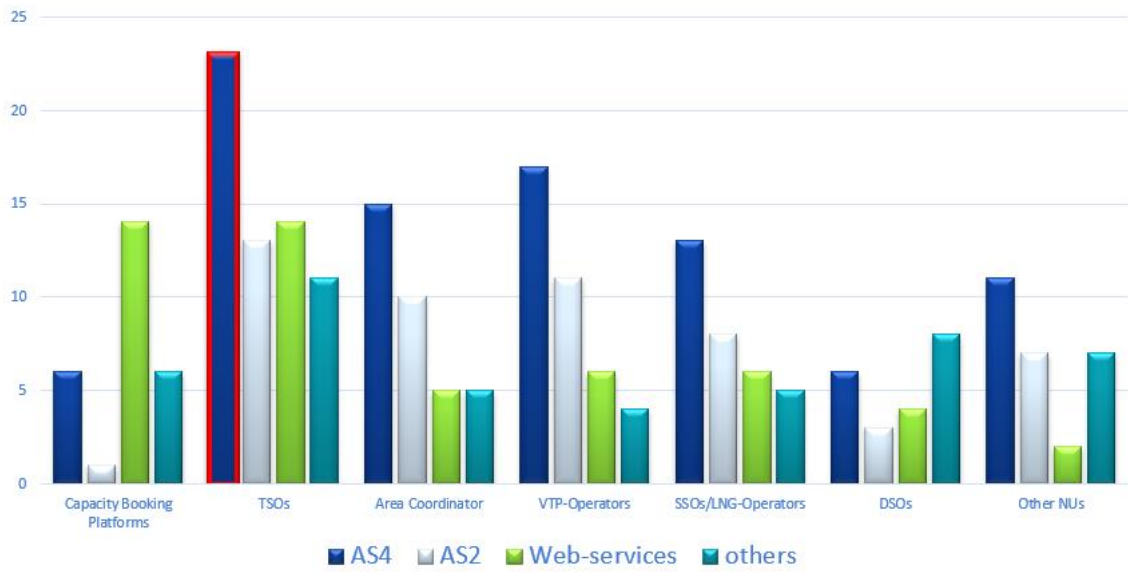
3.3. Support for future formats and protocols to communicate with Capacity Booking Platform Operators

The public consultation participants were asked about their support on a future format and protocols to communicate between Network Users and CBPOs.

3.3.1. Common Format (Edig@s as a format for Booking Platforms)

Both groups are in favour. The majority indicated strong support for Edig@s as the common format for future communication with CBPOs.

One TSO (REN) and three non-TSOs (Linz Strom Gas Wärme GmbH, GasTerra B.V., Gas Management Services Ltd) are not in favour of introducing Edig@s as a common format.
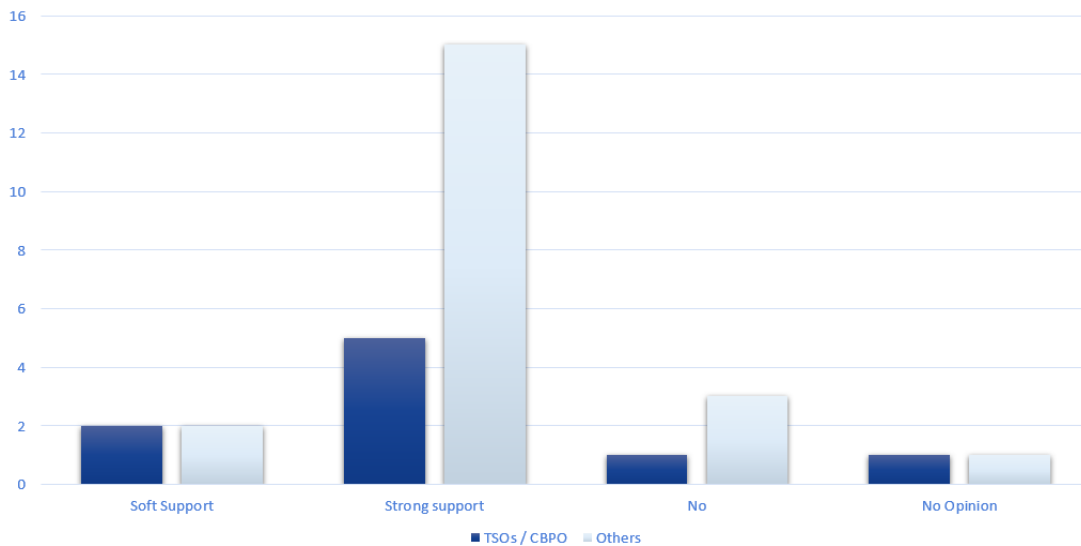
3.3.2. Additional Edig@s functionalities

The majority of the participants (60% - 18 participants) indicated that only activities mentioned in the Capacity Allocation Mechanism NC (CAM NC) should be covered by the format Edig@s. 30% of the participants (9) are requesting for additional functionalities which are needed such as pulling auction calendar data or balancing group information.
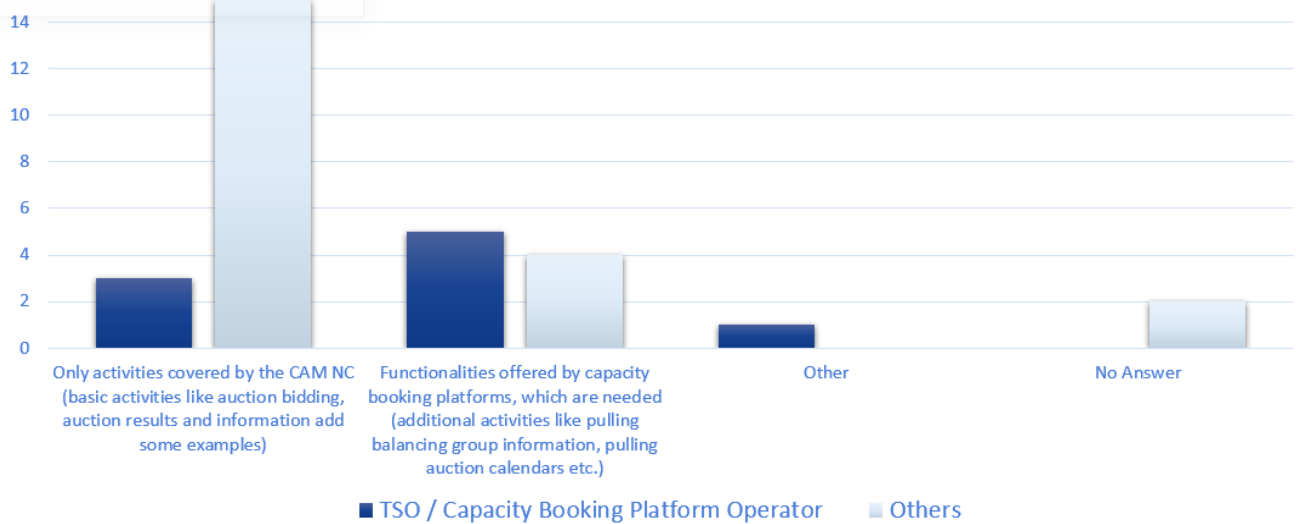
3.3.3. Common Protocol

All participants except one (GasTerra B.V.) are in favour of having one common protocol.
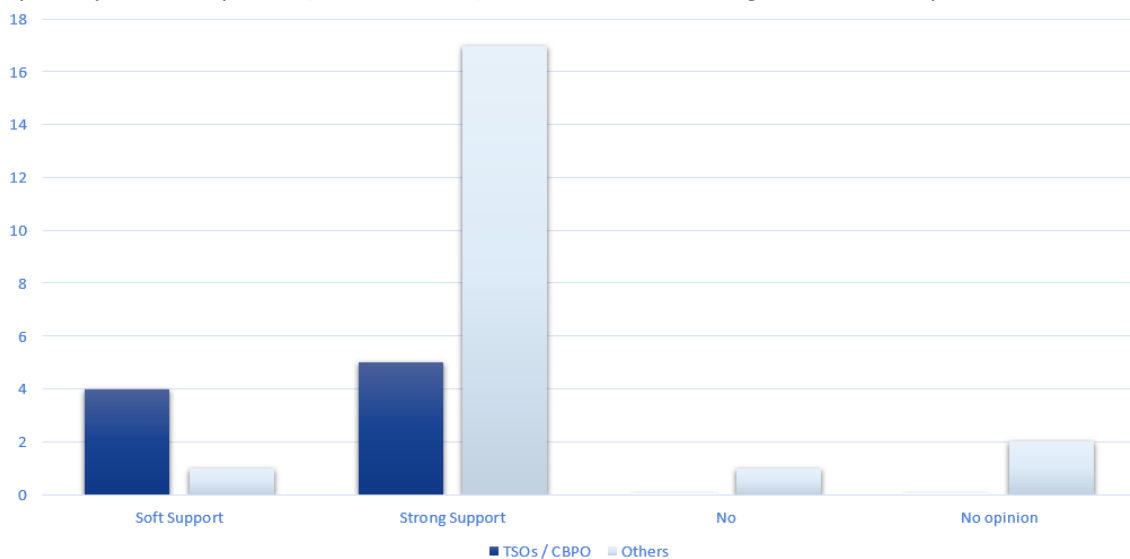
3.3.4. Choice of a Common Protocol

Furthermore, the participants were asked to choose one of the two protocols which are currently used most to communicate with CBPOs (AS4 as defined by the INT NC and REST following the requirements defined by Prisma) as their preferred common protocol.

AS4 was indicated by the majority of both groups as the preferred protocol. REST is supported by three TSOs/CBPOs (i.e. Gas Networks Ireland, Prisma) and three non-TSOs classification for the propose of this exercise (i.e. GasTerra B.V., Thyssengas GmbH[4]).
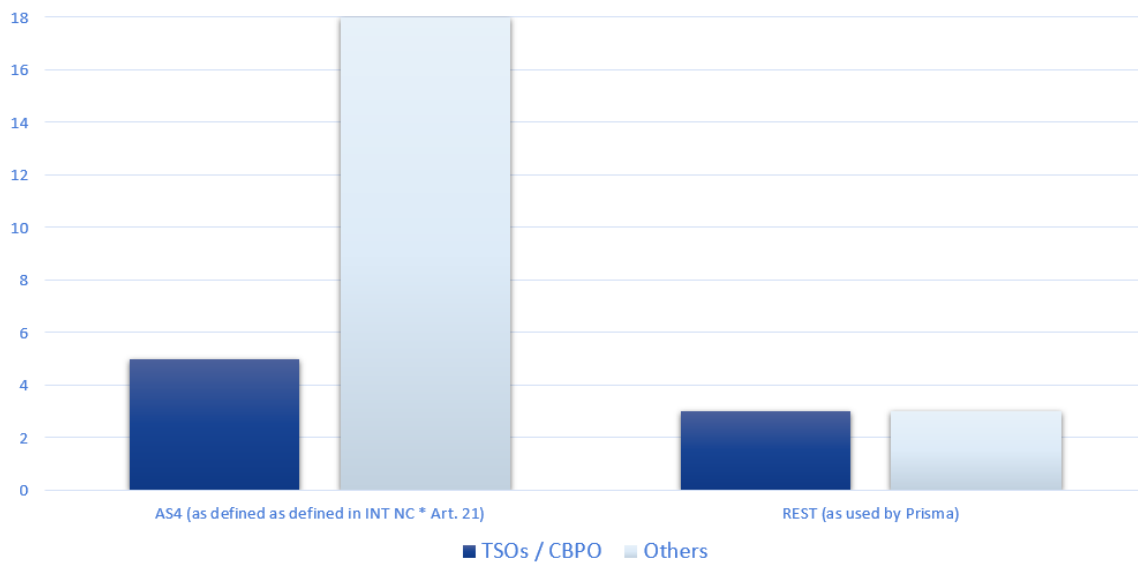
The participants were asked to indicate the pros and cons about both protocols from their everyday perspective of operations. The following options were provided for selection: Costs for end-users, Costs for capacity booking platforms, Speed (implementation), Speed (processing message), Security (authentication), Security (Non-repudiation), and Interoperability (compatibility with other processes). The participants could also provide other answers if the predefined options were not applicable to them.

Protocol	Pros	Cons
AS4	• Interoperability (24) • Security (Authentication) (22) • Security (non-repudiation) (18)	• Speed of implementation (7) • Speed reg. processing messages (4)
REST	• Speed while processing messages (10) • Speed of implementation (9)	• Interoperability (12) • Security (non-repudiation) (10) • Security (Authentication) (9)

AS4 was indicated as the protocol ensuring a high level of security and interoperability.

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[4] Thyssengas is a TSO, but indicated its role as "Shareholder" of Prisma.

REST (as implemented by Prisma) was indicated as the protocol providing a faster initial implementation of the data exchange process.

3.4. Usage of AS4 and Edig@s XML for business processes

The participants were asked about their usage of AS4 and Edig@s in terms of business processes. The graph shows that next to the mandatory usage of AS4/Edig@s XML for Nomination & Matching, this communication type (document based) is also used for Balancing, Capacity Trading, Transparency, and Settlement processes.

The bars with a red outline are mandatory (INT NC / National regulation)

3.5. Continue using the existing protocol of data exchange

The participants were asked if they would like to keep the existing data exchange solution in place even though a common protocol/format is already offered.

56% (17) of the participants would like to continue using the existing format data exchange method in order to have a transition period, where several solutions are supported, which would mitigate transition risks and allow users not able to move to a new protocol to continue with the existing communication.

Some excerpts from the stakeholders' arguments:

- "For a transitory period, existing method should be continued." (BRP)
- "…keep backward compatibility/interoperability." (system operator)
- "The AS4 protocol is a heavy protocol requiring a middleware server running 24/7. This solution is <u>not suitable for smaller companies</u> and individual traders, that still want to automate their processes or connect new frontend implementations. <u>A parallel, simpler and cheaper implementation is still needed </u>to allow for stateless communication and information pulling without investments in the infrastructure." (Prisma and Thyssengas GmbH)
- "For a smooth transition, the cut-over period needs to be longer." (Swedegas)
- "Contingency in case of issues around implementation of new protocol." (BRP)
- "The current [existing] method does not generate new costs." (TAURON Polska Energia S.A.)

- "Because the platform users may need some time to adapt." (REN Gasodutos)
- "[We] will probably implement a new common protocol – However, <u>most likely will a new standard not meet [our] special requirements</u> (since our booking platform also has other business processes)" (system operator)

Please note that some companies did not agree with the publishing of their name. Their quotes are therefore listed without any reference.

3.6. The three most important issues

At the end of the consultation, the participants were asked about their three most important issues in relation to the issue reported by Equinor.

The most mentioned keywords were:

- Costs (mentioned by 14 participants)
- One common standard [5](mentioned by 10 participants)
- Harmonisation (mentioned by 7 participants)
- Interoperability (mentioned by 6 participants)

Please find below the quotes supporting the above-mentioned arguments:

- "Whilst an AS4/Edigas.XML document-based data exchange solution for capacity trading
- processes now works for us, it may be an overkill for some network users who book capacity infrequently, or in just one market. So, the best solution could be to make it mandatory for those network users requesting it, but to keep the current interactive processes available for those network users who cannot justify document-based data exchange." (RWE Supply & Trading.
- "Cost and benefit in the context of the whole market should be considered." (Thyssengas GmbH and Prisma)
- "Having unified messaging principle / approach would significantly reduce costs of
- implementation and complexity for operations / Different standards and methods currently used creates additional complexity." (anonymous participant)
- "Likelihood of errors and therefore costs/ Lack of common protocol / Ease of switching
- between platforms." (Storengy UK)
- "Variety of protocols and formats to manage for a CRP / Increased IT costs (maintenance)." (ENGIE SA)
- "Harmonization is needed. Using Edigas is the best way to harmonize. / Interfaces should not cost extra money as a fee, implementation/maintenance costs are sufficient." (VNG Handel & Vertrieb GmbH)
- "Mandating an AS4/Edigas.XML document based data exchange solution for capacity trading processes will improve our efficiency. It may also encourage TSOs who are currently resisting this solution for nominations and matching to finally adopt it." (RWE Supply & Trading)
- "It is important to maintain a level playing field for companies of different sizes." (Thyssengas GmbH and Prisma)

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[5] "One common standard" is meant as one solution which will be applicable across Europe. Harmonisation can be understood as a generic term towards a future pan-European solution.

4. Further Results from the Public Consultation

4.1. How many messages do you exchange to each counterparty? (Question 10)

The graph indicates that the most frequent message exchange (more than five messages per hour) is towards TSOs and, followed by communication with VTP Operators.

Concerning Capacity Booking Platforms, eight participants indicated to exchange on average1-5 messages per day, while seven participants exchange on average 1-5 messages per hour and four participants exchange more than five messages per hour. Six participants are not exchanging any messages with Capacity Booking Platforms, while three participants exchange messages with them on average less than once per day. This means that 19 participants out of 28 that answered this question are exchanging messages on a minimum daily basis with the Capacity Booking Platforms.
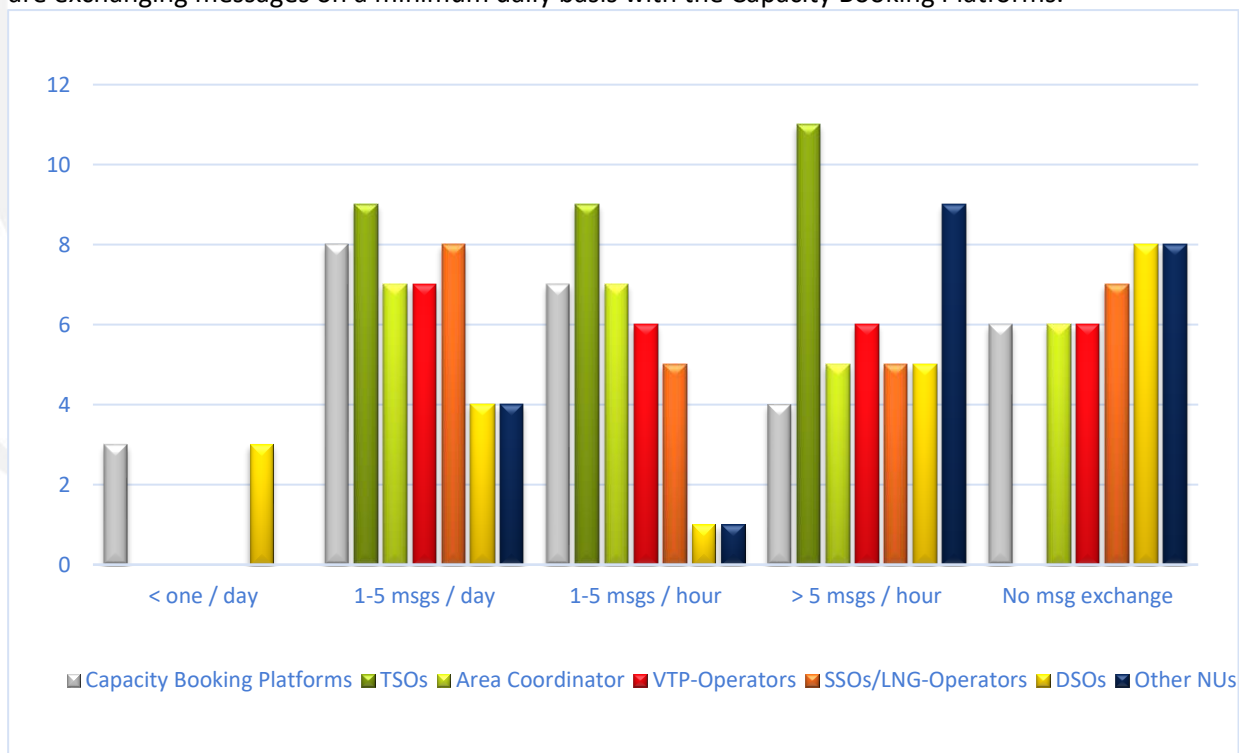
4.2. For which communication do you see a potential for improvement in regard to data exchange and why is this improvement needed? (Question 12)

The participants see potential for improvement regarding data exchange for REMIT reporting processes. Here, generally speaking, uniform protocols and uniform formats are indicated.

RWE Supply & Trading provided the following comment which covers most topics addressed by other market participants as well: The quote gives reasons why there is a need to harmonise and why harmonisation is natural step in terms of progress: "Harmonisation of data exchange for, at least, capacity trading and nomination and matching processes, across all EU system operators, booking platforms and market area managers, would be our strongly preferred option and would enhance market efficiency.

[..] Whilst EU legislation mandating harmonisation applies only to TSO communications with network users active at interconnection points (IPs), and VTPs, and as long as certain TSOs continue to insist that ENTSOG's Common Data Exchange Solution Table is not binding, this will prove difficult to achieve.

RWEST currently operates in over 15 different EU gas markets and could make significant efficiency gains if it was able to standardise its trading operations around a single harmomised data exchange solution, protocol and format.

[..] As long as some operators, or platforms, continue using non-harmonised data exchange solutions, we have no choice but to continue communicating with them and time and resources are required to switch from one solution to another.

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[…] We do now see merit in mandating an AS4/Edigas.XML document-based data exchange solution for the capacity trading processes (as described in the Edig@s version 5.1). [..] we have now implemented this solution for the nomination and matching process with our core TSOs, so to apply the same solution to capacity trading is a natural progression.

[..] it may encourage TSOs who are currently resisting this solution for nominations and matching to adhere to the ENSTOG Common Data Exchange Solution Table.

[…] TSOs would have an incentive to adopt it for non-IP capacity bookings as well

[..] We would insist on a (circa 18 month) transition period before the document-based capacity trading process becomes mandatory, during which time the existing data exchange solution could continue to be used...”

Other suggestions such as the usage of AS4 for communication to VTPs in Germany was already reported in a previous issue on the FUNC platform. (link)

4.3. On how many Market Areas are you active? (Question 11)

As an additional information to the question "3.1 Participants" following graph elaborates on the market participants being active in more than 2 Market Areas. All Balancing Responsible Parties indicated to be active in more than two Market Areas.

Participants active in more than 2 Market Areas

Legend: ■ BRP ■ TSO ■ Capacity Booking Platform Operator ■ Other Role
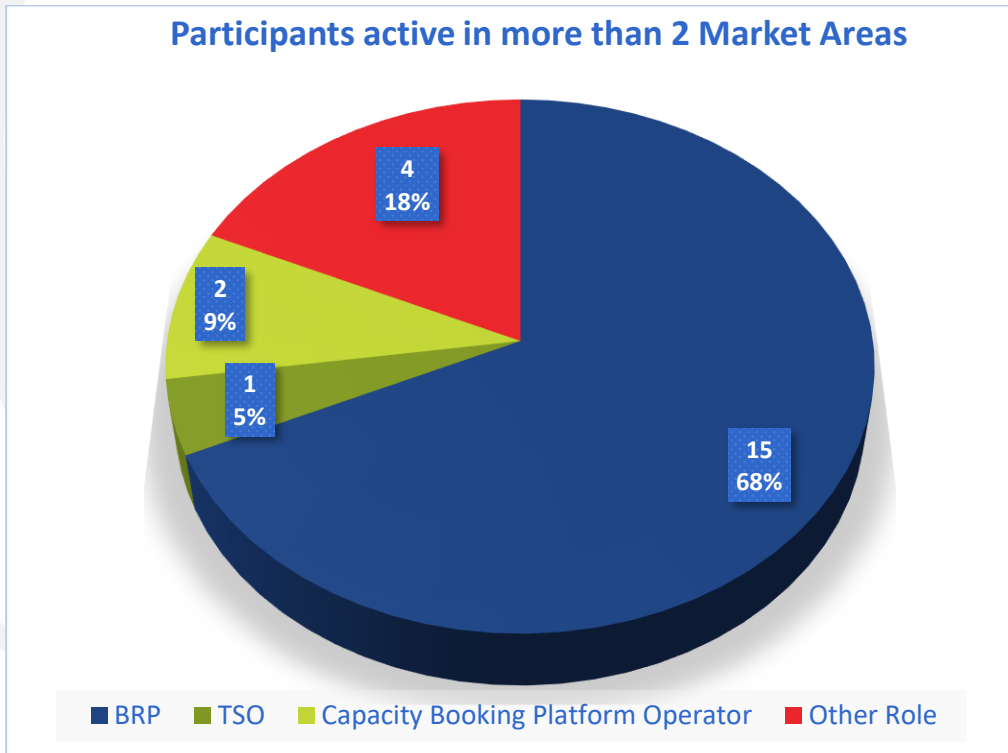
4.4. If Edig@s-XML / AS4 was considered but not implemented, please, indicate reasons why? (Question 14)

This question was raised as a follow-up question to the question "3.4 Usage of AS4 and Edig@s XML for business processes".

24% of the participants indicated that Edig@s and AS4 are not supported by the counterparty ("Some processes partially implemented as required/supported by partners" (GMSL)) followed by 20% indicating high implementation effort and costs as elaborated in following comment: "Implementation of Edig@s for four message types (MAOCAP, AUCRES, AUCBID and ACKNOW) has been discussed and estimated. After the initial cost/benefit analysis, the idea has been rejected due to limited added value and high implementation and operational costs. PRISMA is including new services and new functionalities faster than changes to the Edig@s standard could be introduced." (Prisma and Thyssengas GmbH)

Legend:
- Format / protocol not provided by the counterparty
- High implementation effort/costs
- Open-Ended Response
- High operational/maintenance effort
- Other (please specify)

Pie chart values:
- 6 / 24%
- 5 / 20%
- 5 / 20%
- 2 / 8%
- 7 / 28%
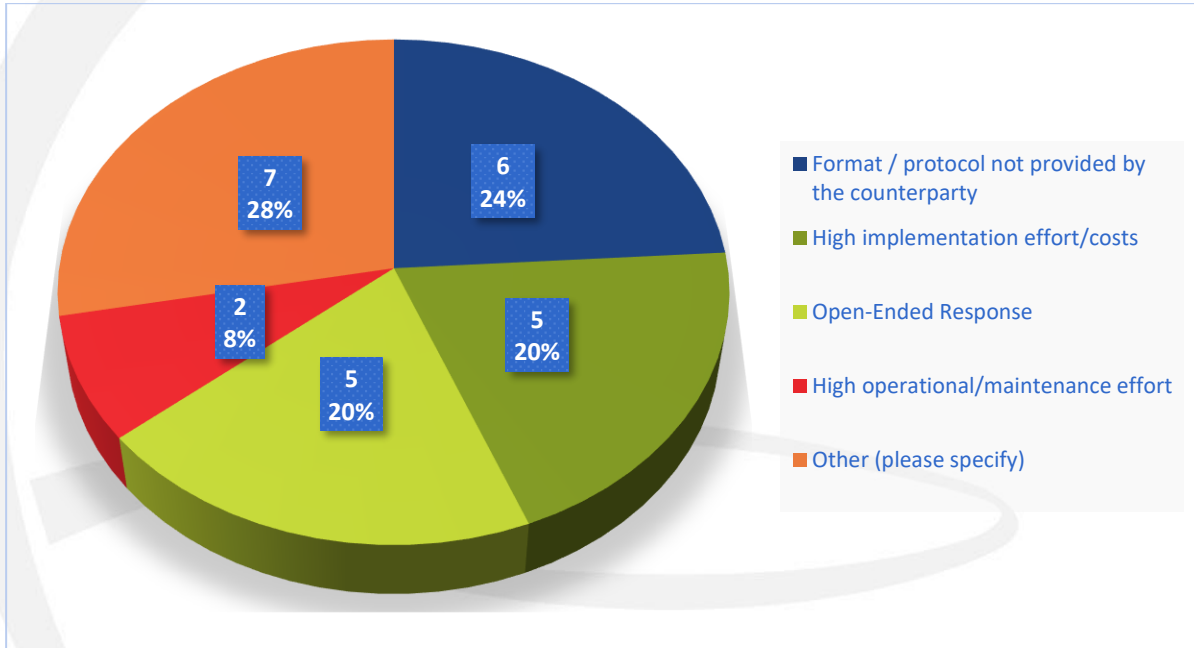
4.5. If Edig@s-XML / AS4 was NOT considered, please, indicate reasons why? (Question 15)

Most of the participants indicated that the main reason why Edig@s XML and AS4 were not considered is the missing implementation by the counterparties and the high implementation effort.
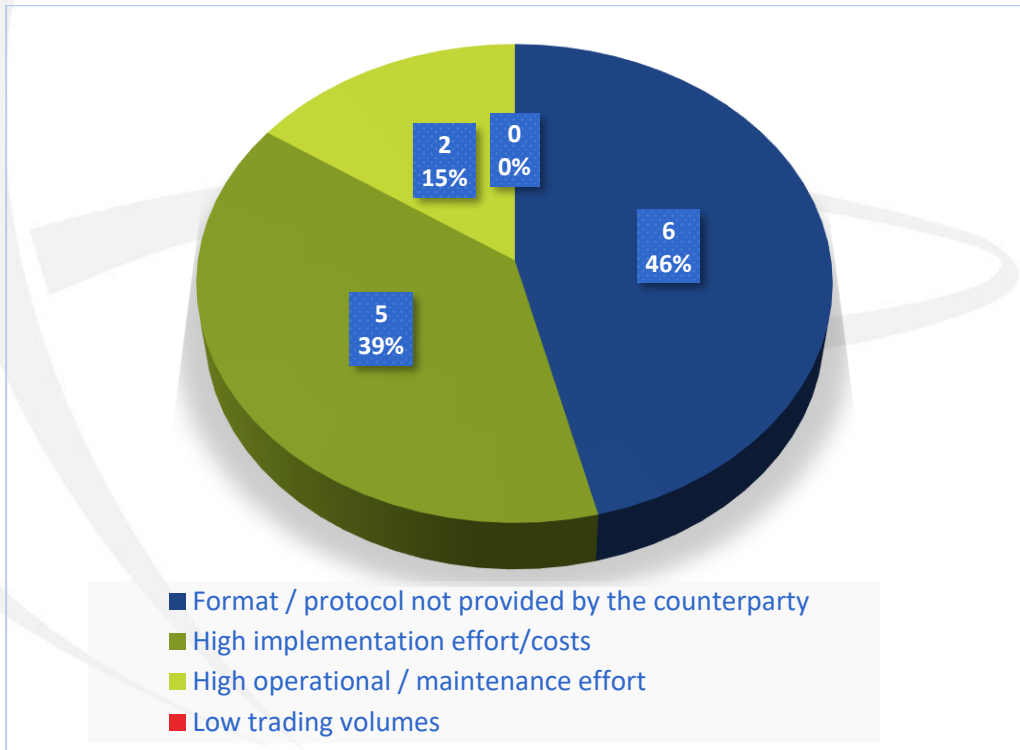
4.6. How many Capacity Booking Platforms do you use? (Question 16)

This evaluation does not consider TSOs and Platform Operators. 33% of the participants excluding TSOs and platform operators are active on 4 booking platforms. The same amount of the participants indicated being active on only 1 booking platform. 19% are active on 3 booking platforms and 5% are active on only 1 booking platform. 10% mentioned that they are not active on any booking platform.
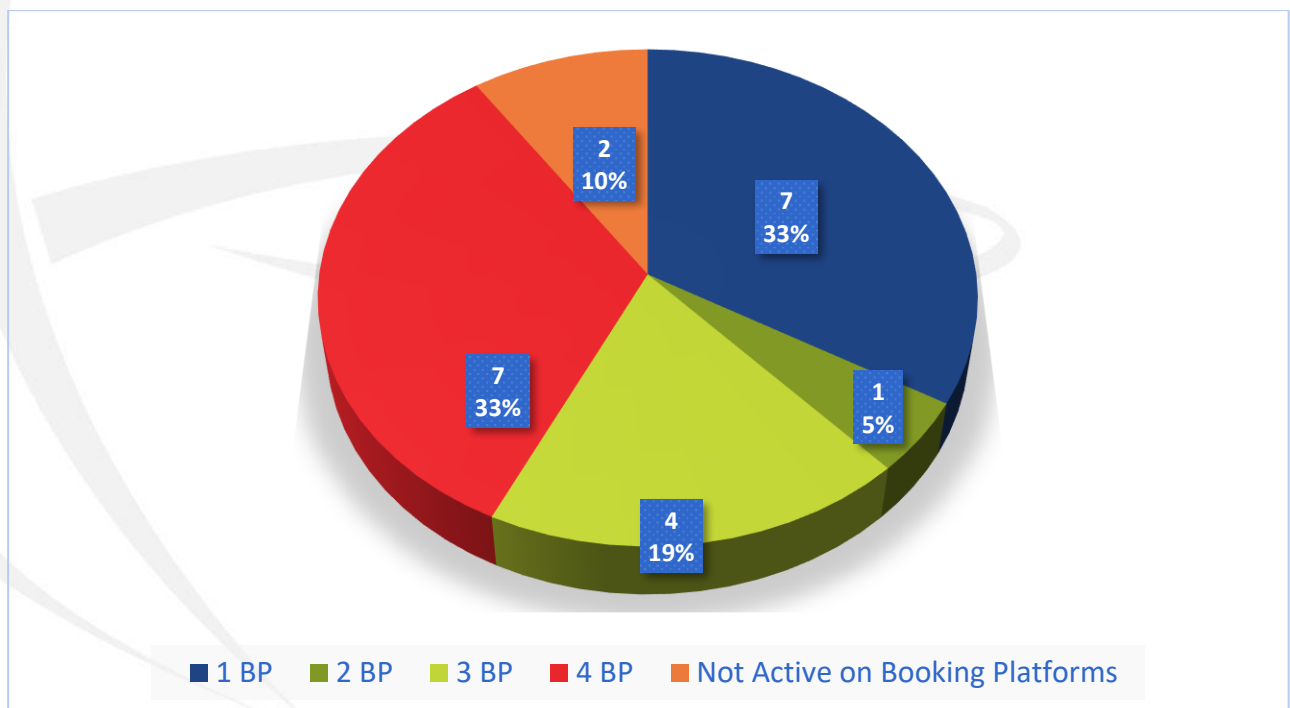
4.7. IF Edig@s XML is chosen as common format for capacity platform for processes mentioned in the Common Data Exchange Solution Table that can be used all over Europe would you then want to implement the solution? Please explain your answer in the "Comments" field. (Question 19)

All participants indicated that they will implement Edig@s XML if this would be the chosen format.

4.8. How much time will it take you to implement the new *format*[6]? (Question 20)

50% of the participants indicated a possible implementation of a new format within six months. The majority of the remaining participants is able to implement a new format within two years.
Only one participant indicated an implementation process longer than three years.

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[6] This question is addressing the implementation of a new format in general.
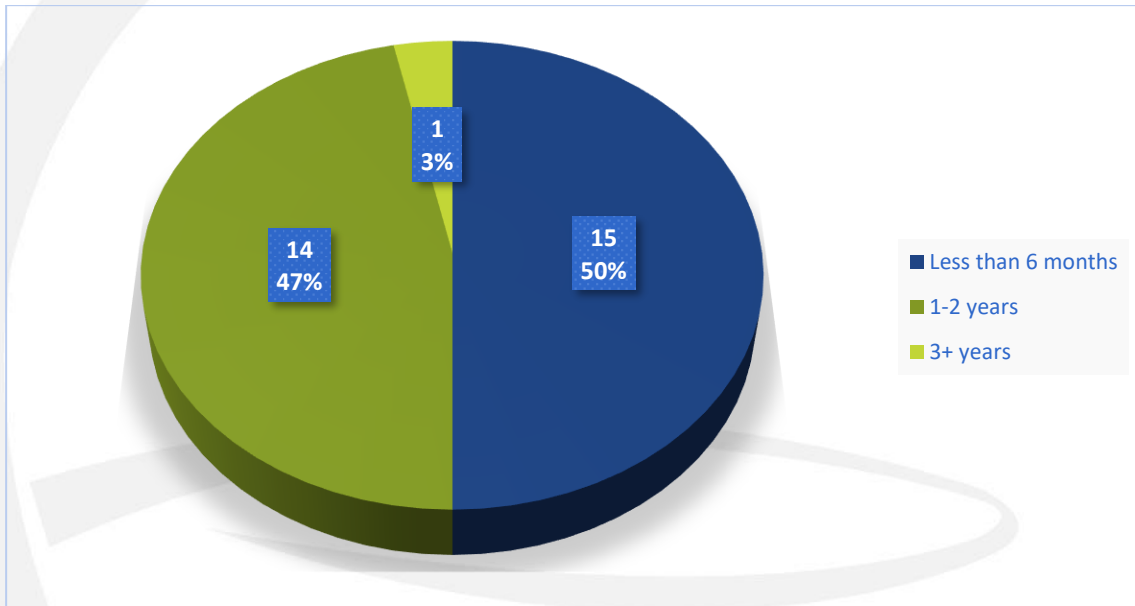
4.8.1.   Please elaborate on the reasons for the implementation timeline (see question 20)

The following comments were shared regarding this question. Please note that some participants did not agree to disclose their company names.

4.8.1.1.   Less than six months implementation:

- "As we use a mapping technology, the process is relatively standardised and will therefore not require longer than 6 months." (Equinor)
- "Much of the technology required already implemented" (Storengy UK)
- "We already have XML proprietary messages. The risk is on the capability of capacity booking platforms doing the necessaries developments." (REN Gasodutos)
- "Existing known protocol and format already in use" (anonymous participant)
- "Edig@s provides standard definitions of business objects used in the gas market (ex. Connection point, account, network users, quantities and their business types) and also rules to describe the time-series (including switch to/from daylight saving time), measure units etc. So basic implementation bricks can be easily reused." (ENGIE SA)
- "The protocol needs to be set up - not sure what will be used, maybe AS4. Implementation with a new partner takes up to 3 months. Implementing the format takes less than 6 months." (VNG Handel & Vertrieb GmbH)

4.8.1.2.   1-2 years implementation:

- "Implementation timeline highly depends on other projects and commitments, as well as the scope of implementation. Introducing Edig@s for communication with Network Users, would mean not only investments of time and material in analysis, design and development, but also in operations and support related processes. New messaging format using code lists instead of human-readable values, requires training of the development team, customer support team and product management team to be able to understand the contents of the message, support the customers and troubleshoot arising issues. Additional messaging formats require also

further efforts in terms of penetration tests and performance tests." (Prisma and Thyssengas GmbH)

- "Developing EDI XML for not supported processes if necessary, takes time." (GASCADE) "Adopting the relevant file formats from scratch, developing process to exchange and validate data flows with the relevant parties and adapting front end systems is complex and time consuming. It also requires structured testing, both internally and with multiple external parties." (RWE Supply & Trading GmbH)
- "Due to the supplier selection process and implementation in the systems used." (TAURON Polska Energia S.A.)

4.8.1.3. More than three years of implementation:

- "Replacing the customer exchanging processes also impact the electricity market in Sweden. The electricity market is moving towards a hub starting going live in 2022+ which makes switching formats in the gas markets less priority for the parties which are involved in both." (Swedegas)

4.9. Would you want the existing method of data exchange to continue despite a common *format* being offered? (Question 22).
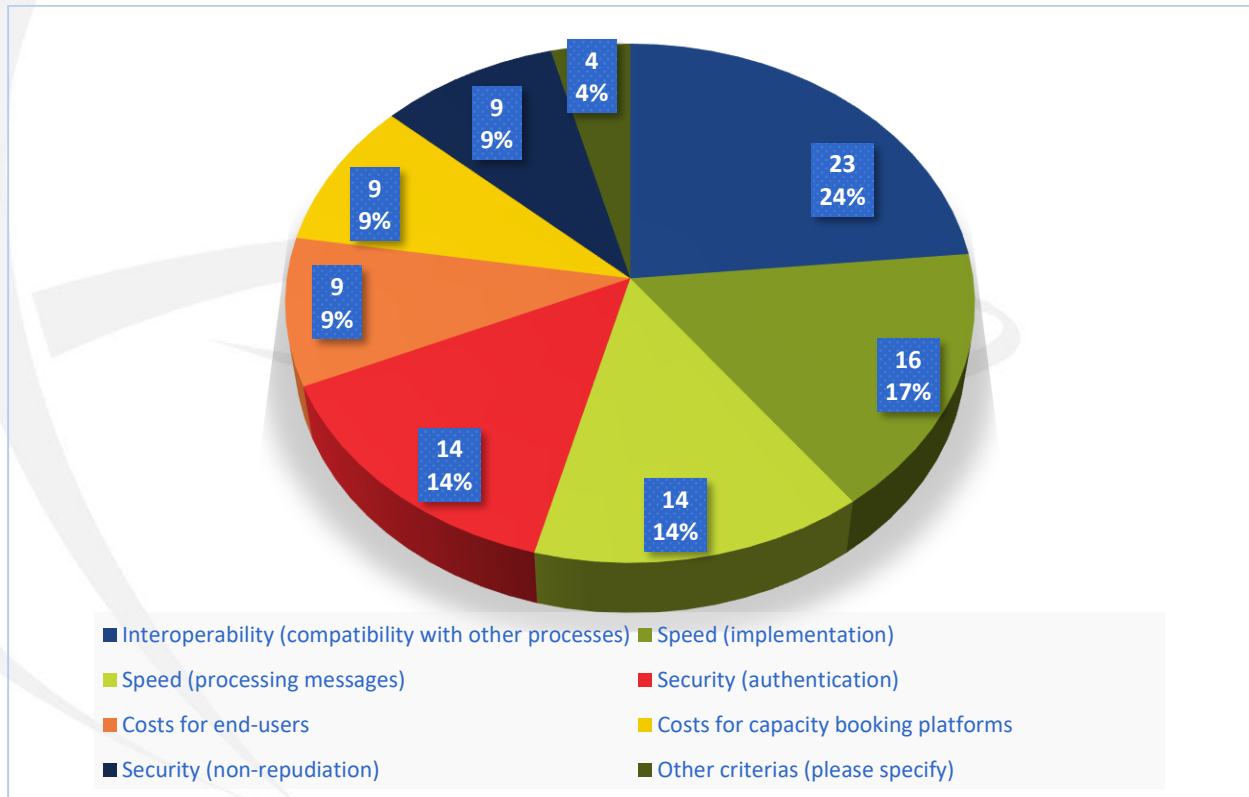
53% (16 out of 30) of the participants would like to keep the existing format despite a common format is already being offered.

The following comments were provided in support of this answer as reasons why the current format should continue to apply (Question 23)

- "For a transitory period, existing method should be continued." (BRP)
- "Because the platform users may need some time to adapt." (REN Gasodutos)
- "Platform specific data exchange methods need to be retained, as the EIDGAS standard does not cover several of the functionalities offered by the booking platforms. Coverage of all processes with the EDIGAS standard would slow down further market development and innovation in terms of service offering. Interactive data exchange remains the most frequently used way of communication." (Prisma and Thyssengas GmbH)
- "If there is a not supported process, we have to used the old data exchange. This makes sense i.e. for a transition period." (GASCADE)
- "The existing method should continue for at least a year afterwards. In doing so it would serve as a contingency and fallback option should implementation take longer than expected, or if the new data exchange processes prove temperamental." (RWE Supply & Trading GmbH)
- "No additional costs necessary." (GasTerra B.V.)
- "To secure a functioning market during transition a cut-over period should be applied." (Swedegas)
- "no IT-Costs. There is an existing process that works, no need to change." (Linz Strom Gas Wärme GmbH)
- "The global gas market requires different protocols." (BRP)
- "Alternative method to submit / Indefinitely." (Gas Networks Ireland)
- "Contingency in case of issues around implementation of new format." (BRP)

4.10. Main criteria for having a common *protocol* (Question 26)

24% of the participants indicated "Interoperability" as their main criteria of having a common protocol, followed by "Speed of implementation" (17%), "Speed of processing messages" (14%) and the "Security in connection to authentication" (14%).

- ■ Interoperability (compatibility with other processes)   ■ Speed (implementation)
- ■ Speed (processing messages)   ■ Security (authentication)
- ■ Costs for end-users   ■ Costs for capacity booking platforms
- ■ Security (non-repudiation)   ■ Other criterias (please specify)

4.11. How much time it will take you to implement the new *protocol*[7]? (Question 30)

50% of the participants indicated "less than 6 months", the other 50% indicated an implementation period of 1-2 years for the implementation of a new protocol.

4.11.1. Elaboration on the reasons (Question 31)

4.11.1.1. In favour of a short implementation, which was less than 6 months:

- "AS ..[4].. it is a product you can buy, around 6 months seems correct." (Equinor)
- "Much of the infrastructure in place." (Storengy UK)
- "If the platform already as the implementation done; it will be possible in 6 months, because we already have one interface developed/tested in the AS4 protocol." (REN Gasodutos)
- "We already use AS4." (RWE Supply & Trading GmbH)
- "<u>Changing how messages are sent is a lot easier</u> than changing the content of what is sent. <u>Does not require a completely new data-model</u>." (Swedegas)
- "Only if REST is similar to AS4." (BRP)

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[7] This question is addressing the implementation of a new protocol in general

- "AS4 is widely used already in Nomination & Matching and Gas Trading. Adding a new process is easier than adding a new protocol." (VNG Handel & Vertrieb GmbH)
- "Already in use by GMSL and wider industry." (GMSL)

4.11.1.2. In favour of an implementation of 1-2 years

- "Small company with limited (human) resources, active on many markets." (BRP)
- "Might take less time, subject to specification and implementation method" (system operator)
- "Changes to new protocol impact on many (business) processes." (system operator)
- "The need to remodel some (business) processes; implementation timeline depends also on the time that GSA Platform TSOs members need to be ready for new protocol usage." (GSA Platform)
- "Experience with IT-projects, less than one year is too fast." (GASCADE)
- "Implementation of the new protocol that doesn't exist today will be time consuming." (SIME Polska Sp. z o.o.)
- "This is our current estimate of the time needed amongst others to update all of our interfaces with the booking platform." (GasTerra B.V.)
- "Internal security resources are limited, in addition – implementation on external users. (system operator)
- new protocol not based on experience so it takes longer time." (other role - customer)
- "Changes to new protocol impact on many (business) processes." (GAZ-SYSTEM)
- "Development Lead-time." (Gas Networks Ireland)
- "Resource availability." (BRP)
- "Due to the supplier selection process and implantation in the systems used." (TAURON Polska Energia S.A.)

Based on the above provided reasons, both, small and large entities see it as an advantage to have a transition period between 1-2 years prior having only one solution in place.

4.12. Would you want the existing method of data exchange to continue despite a common *protocol* is offered? If YES please elaborate on the reasons see question 33? (Question 32)

53% (16 out of 30) of the participants would like to continue with the existing data exchange method in parallel to an already defined common protocol
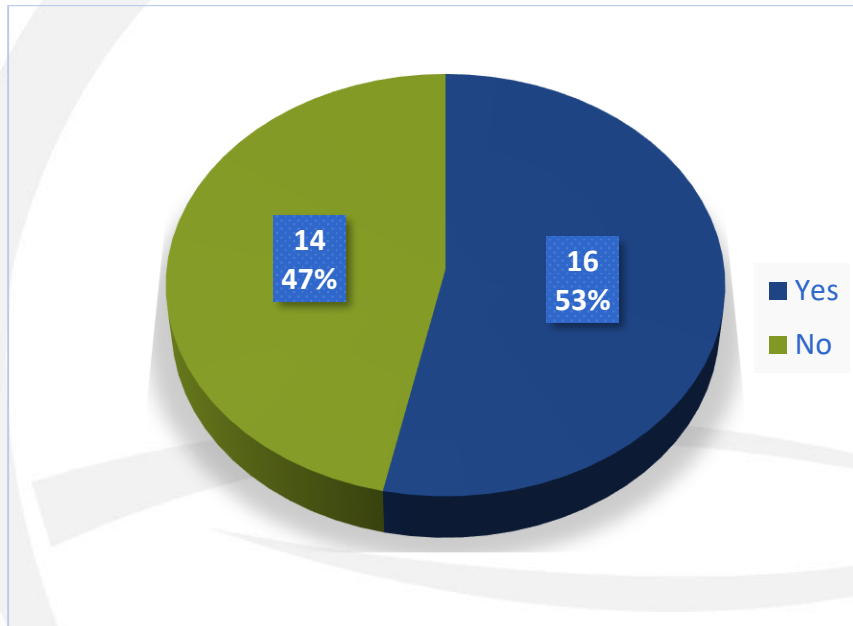
4.13. Please elaborate on the reasons and desired timeframe (Question 33)

Following feedback supporting the possibility to keep the existing solution in place despite a chosen new protocol and format was provided:

- "For a transitory period, existing method should be continued." (BRP)
- "To keep backward compatibility/interoperability" (system operator)
- "The AS4 protocol is a heavy protocol requiring a middleware server running 24/7. This solution is not suitable for smaller companies and individual traders, that still want to automate their processes or connect new frontend implementations. A parallel, simpler and cheaper implementation is still needed to allow for stateless communication and information pulling without investments in the infrastructure." (Prisma and Thyssengas GmbH)
- "For a smooth transition, the cut-over period needs to be longer. (Swedegas)
- Contingency in case of issues around implementation of new protocol." (BRP)
- "The current [existing] method does not generate new costs." (TAURON Polska Energia S.A)

4.14. In case you are already using Edig@s for business processes like Nomination & Matching, what other processes would you like to cover with this format? (Question 35)

The following processes where the participants see an advantage to use the format Edig@s were mentioned:

- Capacity Booking processes (mentioned by 10 participants)
- REMIT (mentioned by 5 participants)
- Allocation (mentioned by 2 participants)
- Balancing (mentioned by 2 participants)

4.15. Please state any general comments (Question 36)

The following general comments were provided. They refer to the need to improve Edig@s description handbooks, and make Edig@s XML a free of charge standard:

- "Edig@s really lacks proper description/handbook in more easily readable format. Standard is good and paramount in any doubts, but without proper communication and explanation it is probably not sufficient as only source of reference." (system operator)
- "[…] supports the Edig@s-XML/AS4 as a common format for capacity platforms. Due to the use of this solution as a communication standard, its further development is highly recommended." (system operator)
- "GSA Platform supports the Edig@s-XML / AS4 as a common format for capacity platforms. Due to current usage of this solution as communication standard, its further development is highly recommended." (GSA Platform)
- "The cost of additional interfaces in any format or protocol should be taken over by the party requesting it. Other market participants should not be contributing to the costs of services, which they are not using." (Prisma, Thyssengas GmbH)
- "GAZ-SYSTEM supports the Edig@s-XML/AS4 as a common format for capacity platforms. Due to current usage of this solution as communication standard, its further development is highly recommended." (GAZ-SYSTEM)
- "PRISMA right now earns money by offering an interface with XML files. That's why we exchange free emails. This new interface should be for free. Another way of funding needs to be found on the capacity platform side." (VNG Handel & Vertrieb GmbH)
- "Any change must result in a system that is fully compliant with applicable competition law, and an assessment should be made prior to implementation to ensure that this is the case." (BRP)

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