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Comment on Coordinated network development plan 2017 - 2026

Dear Sir or Madam,

please find below our observations on the consultation version.

We strongly welcome the initiative taken by GCA to improve the quality of the standard capacity, which was approved in KNEP 2015 with an implementation period Q3 / 2017.

The marketing of storage capacities in competition with other flexibility services depend crucially on an uninterrupted transport situation. Therefore we decisively refuse delaying the package of measures to improve the transport quality of the standard capacity for the winter 18/19.

We infer from the explanations concerning the postponement of the project for "Capacity Order Exit Baumgarten of 600.000Nm³ / h)" that AGGM and MGM and the concerned TSOs have not sufficiently fulfilled their cooperation obligations according to § 19 section 1 of the Austrian gas law (GWG).

It was stated that the approved project was agreed and coordinated between GCA and AGGM in the LFP and in KNEP last year, but not the amendment of the completion date. We can read in the Coordinated network development plan on page 74 on the project of the "TAG 2016/02 AZ1 additional entry and connection to BOP13" that in September 2015 GCA and TAG agreed to combine the new project with the already approved project "GCA 2015 / 07b" (increased demand distribution area). The coordination as foreseen in the gas law between GCA and TAG with AGGM and subsequently with the affected storage company has obviously not taken place.

If this postponement was agreed upon in September 2015 it has to be questioned why GCA and TAG have not promptly submitted a new application to E-Control in order to conduct a timely implementation of the already approved project "GCA 2015/07b".

From the technical description of the project "TAG 2016/02 AZ1 additional entry and connection to BOP13" we understand that there is a connection with the GCA project. However, it should be examined whether the technical measures can not be imple-

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mented in October 2017. Thus, a shift of the project "GCA 2015 / 07b additional demand in distribution area +" could be prevented by a further year.

Without an efficient connection of the Austrian gas storage facilities to the transmission system the security of supply and the possibility of energy solidarity between Member States in Southern / Eastern Europe will suffer. The potential bottlenecks in the storage transports prevent the operation of an integrated internal market for gas and are hereby contrary to the priority objectives of the integration of markets.

Concluding it must be said that from the present consultation documents and explanations in the planning conference the statutory requirements according to § 19 section 1 of GWG have not been met and no adequate reasons for the postponement of the project for capacity order Exit Baumgarten have been given. The shift could have been prevented if there had been a project application to "TAG 2016/02" filed in September 2015 when the postponement was agreed upon between GCA and TAG.

Delaying the implementation of the project in the LFP 2016 "2012/03 - capacity order Exit Baumgarten" or in KNEP "GCA 2015 / 07b additional demand in distribution area +" in Q3 / 2018 is therefore firmly rejected by Uniper Energy Storage and we recommend to finalize the projects as already agreed upon to be available in the withdrawal period starting in 2017.

Best regards,



Mag. Michael Schmöltzer
Branch Manager Uniper Energy Storage Austria