



Implementation of the Virtual Interconnection Point (VIP) Non-binding Public Consultation Evaluation of the comments 19 June 2018

COMMENT 1: There is a need to provide shippers with the right to switch existing IP contracts to the VIP not only before but also after VIP implementation.

- ⇒ Transfer of the existing IP contract to the VIP will be possible at any moment of duration of the respective contract until its termination.
- ⇒ However, there are many advantages for the shippers coming from transfer of all their existing IP contracts to the VIP before 1 November 2018, thus avoiding the dual IP/VIP system.

COMMENT 2: Free of charge capacity conversion service to network users holding mismatched unbundled capacity at one side of an interconnection point shall also be provided for daily and with-in day capacity bookings.

- ⇒ This requirement is not connected with implementation of the VIP. Moreover, Commission Regulation (EU) No. 2017/459 (CAM NC) does not set such an obligation and it was not subject of the Public Consultation.

COMMENT 3: Implementation of VIPs under no circumstances shall result in down-grading the economic conditions for the shippers.

- ⇒ There will be no additional costs for the shippers connected either with implementation of the VIP, or with transfer of the existing IP contracts to the VIP.
- ⇒ All conditions of the contracts will be preserved including price, volumes, duration, etc.
- ⇒ The entry/exit tariffs for the VIP are set on the same level as they are for IPs on the basis of already published Price Decision for calendar year 2019.

COMMENT 4: We do not support the current VIP proposal of two systems. Two separate systems will lead to substantial and additional operational effort and expenses for shippers. (Article 19, 9 will not be met with 2 separate cross-border systems (IP/VIP).)

- ⇒ Each shipper is allowed and encouraged to make a choice on voluntary basis if it wants to preserve its contracts on IPs or to transfer them to the VIP. No shipper is forced to be affected by the dual system, because there is an opportunity for all shippers to transfer all their contracts to the VIP.
- ⇒ Article 19 of Commission Regulation (EU) No. 2017/459 (CAM NC) does not provides sufficient detail for implementation of the VIP. Both dual (IP/VIP) and single (VIP) systems are being considered among the European TSOs.
- ⇒ N4G provides more flexible alternative than a strict dual (IP/VIP) system. Each shipper is allowed transfer all of its contracts to the VIP in the Czech Republic. That means all shippers can avoid being affected by the dual system by the abovementioned transfer.

COMMENT 5: Implementation of the VIP should be postponed.

- ⇒ The term for implementation of the VIP is exactly set by Article 19 of Commission Regulation (EU) No. 2017/459 (CAM NC), i.e. by 1 November 2018.



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COMMENT 6: Already contracted capacity at any side of the border should not be discriminated through the capacity allocation mechanism or the implementation of the VIPs.

- ⇒ N4G is responsible for implementation of the VIP just in the Czech Republic and as such it cannot guarantee any concrete framework for implementation of the VIP on the other side of the border.
- ⇒ There will be non-discriminatory approach to all capacities applied by NET4GAS.
- ⇒ Congestion management procedure (CMP) will be activated only if the VIP capacities are congested.
- ⇒ Additional capacities generated by the CMP will be marketed at the VIP in the auctions according to Commission Regulation (EU) No. 2017/459 (CAM NC).