



LIMITED LIABILITY COMPANY
«GAZPROM EXPORT»

(«Gazprom export LLC»)

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Vereinigung der
Fernleitungsnetzbetreiber Gas e. V.

Georgenstr. 23
10117 Berlin
Germany

Incremental capacities process

Dear Sirs,

We refer to the ongoing consultation launched by FNB GAS on 19th October 2017 in accordance with Article 27(3) of the CAM NC and would like to submit our comments on the published project proposals, especially the technical studies for the market area border between the Russian Federation and GASPOOL as well as between GASPOOL and the TTF.

The following is considered critical in correspondence with the initial demand for incremental capacity expressed by us.

In the technical study you published an offer level for dynamically allocable entry capacity in Greifswald (NEL) which does not cover the peak of our indicated demand of 13,2 GWh/h as well as demand of 11,9 GWh/h for exit capacity from GASPOOL into the TTF market area. Moreover we do not follow and do not agree with your decision to split the evaluation into two separate technical studies for entry and exit as in this case one economic test might be positive whereas the other one might be negative. Therefore an investment on one side would not have any sense since the incremental capacities could not be used as intended. We also believe that the extremely high minimum mandatory premium of 1,92 €/kWh/h/a for the entry capacity is overestimated and might be sufficiently decreased by allocation of the identified grid extension cost not only to the entry but as well as to the exit as we are considering dynamically allocable capacities.

Therefore we would appreciate that the two technical studies are merged into one technical study with only one economic test and that the adjusted results of this merged technical study would be published.

Furthermore we noticed that the technical study does not cover our demand for entry capacity into the German market at all. Gazprom export LLC has initially requested dynamically allocable entry capacity in the amount of 7,8 GWh/h in direction to the border between both existing market areas GASPOOL and NCG. We take note that you did not evaluate our initial request due to the upcoming merger of both German market areas by 01st of April 2022, as the destined market area border will not exist after the proposed merger anymore. The initial request presumed the possibility to gain access to the German market in general either to NCG market area or to merged market area on a firm basis. Since only one capacity request instead of two expressed capacity requests, is considered in the technical studies published they are not in line with the initial demand for incremental capacity and are not valid to our understanding.

We would appreciate if you reconsider your decision and evaluate the introduction of offer levels which cover our indicated demand for the free allocable entry capacity into the merged German market in the framework of this running incremental capacity process if possible.

We look forward to considering our statement and thank you in advance for your prompt reply.

Yours faithfully,

**Deputy Director General
for Gas Export**

A handwritten signature in blue ink, appearing to be 'Dmitry', written in a cursive style.

Dmitry Averkin