

Amber Grid  
via email to: [consultation@ambergrid.lt](mailto:consultation@ambergrid.lt)

18 June 2021

**Subject: EFET<sup>1</sup> response to the consulted changes to the network access rules  
and network balancing rules**

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EFET welcomes the opportunity to participate in Amber Grid's consultation on the revised rules for network access and system balancing. We particularly appreciate the fact that the consultation process along with the related documents have been translated into English, allowing broad participation by different stakeholders from across the EU.

In terms of transmission services and capacity products, we make the following remarks:

1. With Lithuania's integration with the EU gas transmission network, we believe it would be prudent for all capacity products to be expressed in kWh/h to simplify the capacity procurement and nomination process across the entire grid
2. We fail to understand why firm capacity interruptions have to last more than 14 days before the payment obligation for the respective products is lifted from the system users (as per art. 120). Such provision makes the advantage of firm capacity products over interruptible products questionable, since interruptible product holders remain entitled to compensation.
3. Given the early stage of gas market development in Lithuania, we suggest reconsidering whether a minimum collateral amount (art. 145.2) is actually required for securing contractual obligations fulfillment, as this may become an entry barrier for new market participants

In terms of Balancing Rules, we make the following remarks:

1. We echo our remark no.3 to the network access terms with regard to the minimum collateral level mentioned under point 33.3 of the Balancing Rules.
2. The wording of Chapter VI indicates that the neutrality charge is to be calculated against and charged on all gas exits, including the VTP exit (art. 46.3). Under these provisions all sell trades would incur a neutrality charge even if the traders would be balanced at the VTP. We therefore suggest that the calculation is:
  - a. Restricted exclusively to physical flows at exits

<sup>1</sup> The European Federation of Energy Traders (EFET) promotes competition, transparency and open access in the European energy sector. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and enable the transition to a carbon neutral economy. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org).

- b. Restricted to physical flows on both entries and exits – this would reduce the charge level, while recognizing that the system can be either short or long.

We remain at your disposal, should you wish to discuss these matters further.

Kind Regards,  
On behalf of EFET TF CSEE-G

A handwritten signature in black ink, appearing to read 'Pawel Lont', is enclosed in a light blue rectangular box. The signature is fluid and cursive.

Pawel Lont  
European Gas Markets Manager  
EFET Gas Committee