

REZULTATI SAVJETOVANJA SA ZAINTERESIRANOM JAVNOSTI PROVEDENOG OD 6. OŽUJKA DO 23. OŽUJKA 2020.

Prijedlog Pravila o izmjenama i dopunama Pravila korištenja terminala za ukapljeni prirodni plin

Članak Pravila	Podnositelj primjedbe	Primjedba	Odgovor	Obrazloženje
Čl. 3. (Čl. 12. Pravila)	Anoniman	<p>Predlažemo dopunu postojećeg članka 12. Pravila korištenja terminala za ukapljeni prirodni plin na način da se isti uskladi sa stavkom 2. članka 4. Ugovora o korištenju terminala za ukapljeni prirodni plin kojim je propisano kako se korisnik terminala za UPP obvezuje da će najkasnije pet dana prije datuma početka obavljanja usluge LNG terminala ishoditi dozvolu za obavljanje energetske djelatnosti opskrbe ili trgovine plinom u skladu s propisima Republike Hrvatske te istu dostaviti operatoru terminala za UPP.</p> <p>S tim u vezi, a uvažavajući kako je stavkom 12. članka 8. Pravila korištenja terminala za ukapljeni prirodni plin propisano kako je podnositelj zahtjeva dužan, uz zahtjev za raspodjelu kapaciteta, dostaviti (između ostalog) važeću dozvolu za opskrbu i/ili trgovinu plinom, predlažemo dopunu članka na način da se propiše kako je iznimno za prvu godinu početka rada terminala, korisnik terminala za UPP odnosno podnositelj zahtjeva, dužan dostaviti potrebnu energetska dozvolu najkasnije pet dana prije početka rada terminala kako je to i propisano Ugovorom o korištenju terminala za ukapljeni prirodni plin.</p>	Prihvaća se	Postojeći članak 12. Pravila je usklađen sa člankom 4. stavkom 2. Ugovora o korištenju terminala za UPP sukladno prijedlogu. Korisnik terminala za UPP, odnosno podnositelj zahtjeva, dužan je dostaviti dozvolu za obavljanje energetske djelatnosti opskrbe ili trgovine plinom najkasnije pet dana prije početka rada terminala za UPP kako je to propisano i Ugovorom o korištenju terminala za UPP.
General	Anonymous	Based on the consultation held on the 12th of March, Terminal Users are able to allocate their	Explained	Terminal user has the right of submitting his preferred service schedule to the operator, as stated

		regasification capacity usage freely within one gas year for free, meaning at no additional cost. For example: If a User booked 100.000.000,00 m3 regasification capacity for the gas year, it can be fully allocated (100.000.000,00 m3) for the winter, resulting in zero regasification capacity for the summer. This is not fully clear based on the wording of the rules, please include a clarification.		in the comment. During the process of creating a joint service schedule and bearing the technical characteristics of the terminal in mind, the operator accepts the preferred schedule of each terminal user in the maximum extent possible. If it is not possible to reconcile service schedules of all users according to the technical characteristics, they will be modified to a certain extent and sent to the users for their approval. The operator will always endeavor to meet each individual terminal user's wanted schedule while at the same time respecting the technical capabilities of the terminal itself and treating all users equally.
General	Anonymous	Please publish the technical characteristics of the terminal.	Explained	Technical characteristics of the terminal are in drafting process and will be published as soon as finalised.
General	Anonymous	Change in LNG Regasification capacity allocation rules to first come first serve basis as per the Proposal of the Amendments of the Rules of operation: We support the First come first served method for short term booking. However, for annual/multi-annual booking procedure we propose to apply pro rata allocation method in case of overbooking which is more market oriented and ensures higher level of transparency. There are 2 ways to use this method: A) Pro rata allocation method simply applied based on regasification demand per year. (Whereby the allocated capacity shall be above the minimum acceptable LNG regasification capacity of the applicant.) B) In order of priority: (1) largest LNG regasification amount requested in a gas year then (2) lowest minimum acceptable	Explained	The proposed amendments are made in line with transparent, non-discriminatory and market-oriented EU practices and rules to allow all interested users equal access. Upon proper submission of the request, the LNG regasification capacity shall be allocated to the applicants in order in which they submitted the request and in the amount requested for each gas year, as long as there is available LNG regasification capacity for that year. This way applicants who are truly interested in booking the LNG regasification capacity at the terminal, have the opportunity to get allocated capacities.

		regasification capacity then (3) if (1) and (2) is equal, pro rata allocation (instead of first come first served as per the original rules)		
Article 7/9	Anonymous	Based on the original rules, Article 7/9 - in case of Short-term capacity booking the Terminal Users have to submit together with the application for the short-term capacity evidence of the booked TSO capacities. We suggest removing this requirement (as per the new rules we understand it will be removed.). We support to remove such TSO entry booking requirement also for annual or multiannual bookings.	Accepted	TSO bookings have been removed in accordance with the proposal.
Article 18/2	Anonymous	We suggest including the definition of “regularly update and publish”- how regularly, deadline, etc.	Explained	It is clearly written that the obligation is to announce those as soon as yearly capacity booking is closed.
Proposal of the Amendments of the Rules of operation- definition 69 (previously 70)	Anonymous	Definition change. "69. Short-term LNG Regasification Capacity Booking - procedure during which the Short-term LNG regasification capacity is allocated within one gas year, for at least one month until the end of the gas year and the LNG regasification service is contracted when there are available slots and available capacity within that gas year, which is carried out after the completion of the Annual Capacity Booking procedure, in accordance with these Rules." What is the meaning of the bold italics inserted part? Short term regasification capacity should be available also only for a single day. Instead of “month” it should be “day”.	Rejected	Since the short-term schedule according to the Rules of operation is defined on a monthly basis, the minimum should be one month.
Proposal of the Amendments of the Rules of operation: Article 12/5/5	Anonymous	In new Article 12, paragraph5, item (5) – why is it in kWh/day and not kWh/year if it is freely allocable later within the gas year?	Explained	It is stated in kWh/d to be in line with the rest of energy measurements prescribed by the Rules of operation.

<p>Multiple articles which are not part of public consultations</p>	<p>Anonymous</p>	<p>Suggestions for individual articles of the Rules of operation of liquefied natural gas terminal which are not part of public consultations</p>	<p>Explained</p>	<p>In accordance with the rules for conducting public consultations, articles to be discussed and amended are only those which are specified and announced in the Proposal of the amendments of the Rules of operation. Thank you for your proposal / inquiry which we will consider in any of the following public consultations when those certain articles will be publicly discussed and amended.</p>
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