

October 3, 2019

Gas Market Code and Information Exchange Guidelines

Version 1.5

October 3, 2019

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Version history

Version	Date	Change
1.2	28.6.2019	First English version. The guidelines will be updated as progress is made in technical implementation.
1.3	4.9.2019	Added recommendation for DSOs to upload Metering Site data by 2nd Oct 2019, clarifications on opening of the Portal, no-later-than deadline for basic data upload in Data Hub, description of Data Hub demo environment and mentioning of Retailers' biogas data exchange. Changed the date of opening the Submission of Notifications of Market Participant Relationships 3 Oct -> 15 Oct and as-of date, when TSO is able to sign and return the framework agreements 1 Sep -> September 2019.
1.4	13.9.2019	Added TSO's postal address for sending the signed agreements
1.5	3.10.2019	Added definition for the bank account mentioned in the creditworthiness chapter of the framework agreements

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1 Introduction

The Gas Market Code and Information Exchange Guidelines supplement the Finnish Gas Market rules that enter into force on January 1, 2020.

The Gas Market Code and Information Exchange Guidelines have been drawn up for Shippers, Traders, Transmission Network End Users, Biogas Injecting Parties, Distribution System Operators and Retailers to further specify recommendations related to procedures and requirements and instructions relating to the exchange of information.

The up-to-date version of the Gas Market Code of Conduct and Information Exchange Guidelines is maintained on the website of the Transmission System Operator with System Responsibility.

2 Definitions

The definitions provided in the Gas Transmission Rules, Gas Distribution Rules and Biogas Rules in their up-to-date versions shall be in force in this document.

3 Transition into the new market model

3.1 Rules and agreements for the open market

The rules and agreements for the open market were published in July 2019. Government decrees, guidelines of the Finnish Tax Administration and regulations of the Energy Authority will be supplemented during autumn 2019. If these result in any amendments to the market rules or agreements, new versions of the rules and agreements will be provided as soon as possible. Amendments to terms and conditions confirmed by the Energy Authority may also require a consultation procedure.

3.2 Trial use of information systems and testing of information exchange

It is recommended that Distribution System Operators start testing Metering Site data and measurement data entry no later than during June 2019 because notifications of changes of retailer are possible under the new Market Rules already starting from October 3, 2019. Transmission System Operator with System Responsibility recommends that Distribution System Operators upload Distribution Network Metering Site data to Gas Data Hub before 3rd October 2019 so that change of retailer becomes possible.

Participants registering as a Market Participant may operate in the market also without information exchange between applications (API interface and electronic messaging). The Portal of the Transmission System Operator with System Responsibility was launched regarding API testing environment and data structure description on September 1, 2019. Portal's user interface will open 1st October 2019 (concerning Shipper's capacity booking). As regards Nominations and Trade Notifications, the **testing opportunity** opens from October 1, 2019 onwards using Edig@s messages (concerns Shippers and Traders). Submission of Notifications of Market Participant Relationships via Portal's user interface begins by October 15, 2019. Access to the Portal of the

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Transmission System Operator with System Responsibility requires that the Market Participant has first registered as a Market Participant.

3.3 Registration as a Market Participant

Registrations as a Market Participant started from Aug 1, 2019. Market Participants are the relevant Shippers, Traders, Transmission Network End Users and Biogas Injecting Parties. In addition, all Distribution System Operators shall register with the Transmission System Operator with System Responsibility in accordance with the registration process set out below.

The registration process is as follows:

- Market Participants shall submit their Master Data to the Transmission System Operator with System Responsibility by filling in the electronic registration form provided on the Transmission System Operator's website. If the Market Participant registers in the market role of Shipper or Trader, it shall in conjunction with the registration form also submit an extract from the Trade Register (or a corresponding national document if the company is registered in a country other than Finland) that is a maximum of three months old as well as the company's latest financial statements (if available). In addition, the Market Participant shall submit to the Transmission System Operator with System Responsibility two written copies of the original market role-specific Framework Agreement signed by the Market Participant. The same Market Participant may submit several Framework Agreements depending on the market roles in which the Market Participant in question wishes to register. TSO's postal address for sending the signed agreements:
TSO, Gasum Oy
Janne Grönlund
Kiehuvantie 189,
FI-45100 Kouvola, Finland
- A Distribution System Operator shall submit its Master Data to the Transmission System Operator with System Responsibility by filling in the electronic registration form provided on the Transmission System Operator's website. In addition, the Distribution System Operator shall submit (see postal address above) to the Transmission System Operator with System Responsibility two written copies of the original Cooperation Agreement between the Transmission System Operator with System Responsibility and the Distribution System Operator signed by the Distribution System Operator.
- The Transmission System Operator with System Responsibility signs the agreements received as from September, 2019 and delivers them no later than within two weeks provided that the Counterparty to the agreement has submitted the information and documents required from it. At the same time, the Market Participant receives from the Transmission System Operator with System Responsibility the right of access to and user ID for the Portal to the email address given by the Market Participant as its Master Data to the

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Transmission System Operator with System Responsibility. The Transmission System Operator with System Responsibility sends one original of the signed agreements to the postal address given by the Market Participant as its Master Data to the Transmission System Operator with System Responsibility.

- A Transmission Network End User (excluding users registered with the Tax Administration¹) and a Distribution System Operator shall submit to the Transmission System Operator with System Responsibility in accordance with the agreements sufficient security before the Market Participant's commercial operations may begin. It is recommended that the Security Undertaking Agreement of the Transmission System Operator with System Responsibility available on the [website](#) of the Transmission System Operator with System Responsibility be used when drawing up the security undertaking. The Transmission System Operator with System Responsibility shall be given security the value of which equals the Transmission Network End User's or Distribution System Operator's largest monthly invoice actually sent within the past 12 months concerning natural gas taxes and strategic stockpile fees covering on a sliding scale also taxes and strategic stockpile fees paid by the Market Participant in 2019. According to the framework agreements the Transmission System Operator with System Responsibility shall accept as security on-demand guarantees of an A-rated (Moody's or Standard & Poors) financial institution registered in an EU Member State and the Shipper's or Trader's cash deposits into a bank account designated by the Transmission System Operator with System Responsibility. The bank account shall be a collateral account of an A-rated (Moody's or Standard & Poors) financial institution registered in an EU Member State. The pledge agreement of the cash deposit on the collateral account shall be submitted to the Transmission System Operator with System Responsibility.

- A Shipper and a Trader shall provide the Transmission System Operator with System Responsibility with sufficient security in accordance with the agreements before the Shipper may order Capacity and a Shipper or Trader wishing to operate in the role of Balance Responsible Shipper or Trader may operate as a Balance Responsible Shipper or Trader. It is recommended that the Security Undertaking Agreement of the Transmission System Operator with System Responsibility available on the [website](#) of the Transmission System Operator with System Responsibility be used when drawing up the security undertaking. The Transmission System Operator with System Responsibility shall be provided with security the value of which at any given time shall be the amount of the largest monthly Capacity invoice actually sent for the past 12 months times three. However, this security requirement shall be applied in the manner as if all Shippers registering as Market Participants as from August 1, 2019 were new operators without any previous Capacity Agreements. A further requirement for a Balance Responsible Shipper or Trader shall be

¹A Transmission Network End User which has applied for the status of registered user with the Tax Administration does not need to provide the Transmission System Operator with System Responsibility with security.

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that the value of security given to the Transmission System Operator with System Responsibility shall cover the Balance Responsible Party's outstanding invoices at any given time for imbalance charges and estimated imbalance charges that have not yet been invoiced to the Balance Responsible Party, including a 10% security margin for monthly fluctuation in imbalance charges. The principle whereby all Market Participants registering as Balance Responsible Shippers and Traders as from August 1, 2019 are new operators shall apply also to this security requirement. According to the framework agreement the Transmission System Operator with System Responsibility shall accept as security on-demand guarantees of an A-rated (Moody's or Standard & Poors) financial institution registered in an EU Member State and the Shipper's or Trader's cash deposits into a bank account designated by the Transmission System Operator with System Responsibility. The bank account shall be a collateral account of an A-rated (Moody's or Standard & Poors) financial institution registered in an EU Member State. The pledge agreement of the cash deposit on the collateral account shall be submitted to the Transmission System Operator with System Responsibility.

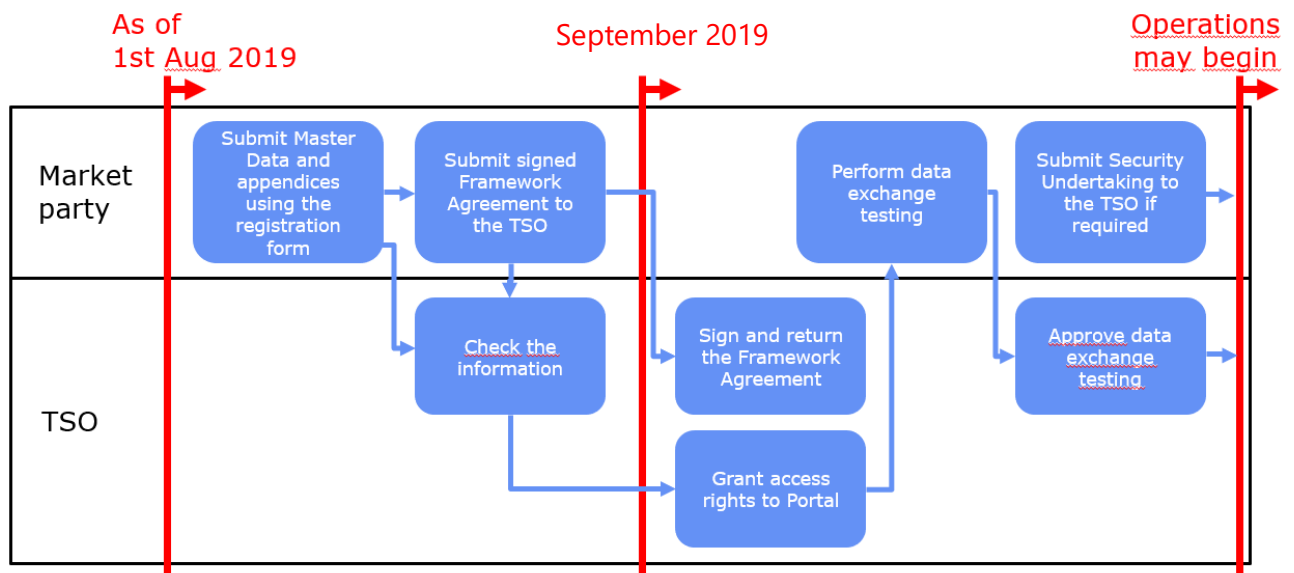


Figure 1. Process diagram for registration as Market Participant

3.4 Opening of the retail market

The retail market opens up to competition as of 07:00 on January 1, 2020.

Since February 2019, a Gas Data Hub delivery project for Distribution System Operators has been underway, in conjunction with which Distribution System Operators are able to perform the necessary data conversion and testing (see Figure 1 below). Retailers will be provided with Gas Data Hub user guidelines and introduction video in September 2019.

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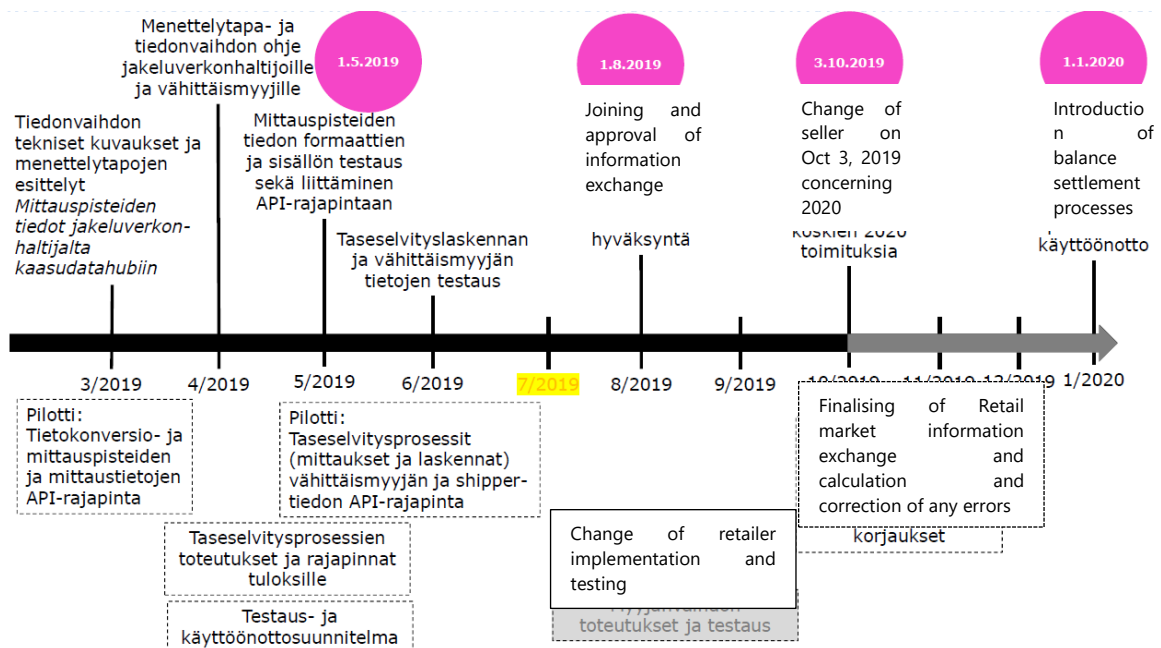


Figure 2. Gas Data Hub launch stages (Full English translation of the picture will be provided later)

Retailers may begin notifications of changes of Retailer and moves as of 12:00 noon on October 3, 2019. Transmission System Operator with System Responsibility recommends that Distribution System Operators upload Distribution Network Metering Site data to Gas Data Hub before 3rd October 2019 so that change of retailer becomes possible. Notifications of changes of Retailer that concern the Gas Day 1st January 2020 can be made in Gas Data Hub until 7.00 17th December 2019. All basic data concerning 1st January has to be uploaded in Gas Data Hub no later than 7.00 17th December 2019. Customer moves can be notified also after that deadline.

Technical guidelines for the Gas Data Hub are available on the Portal of the Transmission System Operator with System Responsibility in conjunction with registration as a Market Participant. The technical guidelines comprise the following documents:

- Centralized information exchange interfaces for the gas retail market (currently document only in Finnish)
- Gas Data Hub user guidelines for Retailers, Distribution System Operators and Biogas Injecting Parties (if connected to the Distribution Network)

Gas Data Hub's REST API interface can be connected to only from pre-agreed IP addresses.

3.4.1 Gas Data Hub's demo environment

Gas Data Hub's demo environment is available to Distribution System Operators and Retailers. In the demo environment it is possible to experiment operations with imaginary data. The data in the

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demo environment is visible to all parties connected to the environment. It is also possible to request a private demo environment, where the data is visible to the actor itself and the TSO.

3.5 Launch of wholesale market information exchange

The wholesale market opens up to competition at 07:00 on January 1, 2020.

Capacity orders will be opened up for Shippers at the Imatra Entry Point, Biogas Virtual Entry Point and Exit Zone at 12:00 noon on October 1, 2019.

Receipt of first Nominations for the Imatra Entry Point will be opened up at 12:00 noon on December 2, 2019. Receipt of first Nominations for the Balticconnector Entry and Exit Points will be opened up at 12:00 noon on December 2, 2019. The time limit for the receipt of first Nominations closes at 15:00 on December 31, 2019. From that point onwards the Nomination and Renomination schedules in accordance with the EU Network Codes shall apply.

Receipt and processing of Trade Notifications begin at 12:00 noon on December 2, 2019.

Submission of Notifications of Market Participant Relationships begins by October 15, 2019. If a Market Participant Relationship must be in force starting from 07:00 on January 1, 2020, the Market Participant Relationship shall be notified to the Transmission System Operator with System Responsibility by 07:00 on December 29, 2019 (see chapter 4 of the Gas Transmission Rules). When the market is opened up, if an appropriate Market Participant Relationship with a Shipper has not been registered for a Market Participant, section 4.4.3 of the Gas Transmission Rules shall apply based on the fact that all Market Participant Relationships in accordance with the old market model will end at 07:00 on January 1, 2020.

3.6 Changeover to the new market model at the turn of 2019 and 2020

At the turn of 2019 and 2020, the Transmission System Operator with System Responsibility and the Distribution System Operators shall process the first seven hours of 2020 in accordance with the old market rules. As regards taxation, however, the tax price level that becomes effective at the start of 2020 shall apply to these hours. More detailed guidelines for this are expected from the Tax Administration by early September 2019.

As of 07:00 on January 1, 2020, the market rules of the open Gas Market shall apply. At the turn of 2020 and 2021, the first seven hours of 2021 shall belong to the December 2020 balance, including as regards taxation.

The Market Participants shall take the introduction of Gas Days into account in their own invoicing. The old invoicing principles may be applied for the first seven hours of 2020, but from then onwards in invoicing for each month the first seven hours of the calendar month shall belong to the balance of, and therefore also to the invoicing of, the preceding calendar month.

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4 Participant identifiers

For the purposes of information exchange, a Market Participant needs a Participant identifier that the Market Participant shall notify to the Transmission System Operator with System Responsibility in conjunction with registration in the Register of Market Participants. The requirements and guidelines concerning applications for Participant identifiers are provided below.

The same company may use both the Energy Identification Code (EIC) and one or multiple Global Location Numbers (GLN) for operating in different market roles. However, only one Participant identifier may be used for each market role. The same Participant identifier may not be used for multiple market roles. The Participant identifier shall be notified to the Transmission System Operator with System Responsibility in conjunction with registration as a Market Participant.

4.1 Shipper's and Trader's Participant identifier

A Shipper and a Trader shall use as their Participant identifier a Party Code determined in the European Identification Code (EIC) system (the EIC X code).

If the same taxable unit has obtained an EIC X code for the electricity market, that EIC X code shall also be used in the Gas Market. The EIC is required in contexts such as certain reporting to the authorities. The EIC system is administered by ENTSO-E, the European Network of Transmission System Operators for Electricity. In Finland, EIC codes are issued by Fingrid for the electricity market and by the Transmission System Operator with System Responsibility of the Gas Market for the Gas Market. For more information about requesting an EIC X code see <https://kaasumarkkina.fi/eic-codes/>

4.2 Distribution System Operator's and Retailers' Participant identifier

A Retailer and a Distribution System Operator shall use the Global Location Number (GLN) of the GS1 system as its Participant identifier. A Retailer and a Distribution System Operator may select its preferred GS1 Company Prefix length (7, 9, 10 or 11).

If the same Participant (same taxable unit) acts in multiple market roles (e.g. Distribution System Operator and Retailer), it shall use in its information exchange GLNs with the same Company Prefix but with a different running consecutive numbering. The Participant shall notify the GLNs used by it to the Transmission System Operator with System Responsibility, which shall accept the identifiers and publish them to the other Participants. The Participant shall also notify for which market role each GLN is used.

The Participant shall order the GS1 Company Prefix from GS1-Finland (<https://www.gs1.fi/en/our-services/become-a-customer>).

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4.3 Transmission Network End User's and Biogas Injecting Party's Participant identifier

The Transmission System Operator with System Responsibility shall determine for Transmission Network End Users and Biogas Injecting Parties the Participant identifiers that they shall use in their information exchange.

5 Metering Site identifiers and measurement areas

5.1 Transmission Network Metering Site identifier

The Transmission System Operator with System Responsibility shall determine national Metering Site identifiers for Transmission Network End User Metering Sites and Biogas Entry Points connected to the Transmission Network. The Global Service Relationship Number (GSRN) registered by the Distribution System Operator in question in the Register of Metering Sites shall be always used for Biogas Entry Points connected to the Distribution Network. Transmission Network End Users and Biogas Injecting Parties may check their own Metering Site identifiers on the Portal of the Transmission System Operator with System Responsibility.

5.2 Distribution Network Metering Site identifier

Distribution Network Metering Sites and Biogas Entry Points connected to a Distribution Network shall have a Global Service Relationship Number (GSRN) determined in accordance with the GS1 system.

Generally with 18 digits, the GSRN consists of the GS1 Company Prefix, Service Reference and Check Digit. The length of the Service Reference depends on the length of the GS1 Company Prefix. There are no restrictions placed by the GS1 organization on the use of the Service Reference and the determination of its individual digits. Enterprises may determine the Service Reference freely provided that all identifiers are unique.

The GSRN must remain effective for the entire life cycle of the Distribution Network Metering Site or Biogas Entry Point.

5.3 Measurement areas

No Network identifiers are required for Distribution Networks. Each Distribution Network forms one or multiple measurement areas in accordance with the principles given below:

- a) Distribution Network to which no Biogas Entry Point has been connected

The Distribution Network forms one measurement area for which the calorific value of the Transition Point between the Transmission Network and the Distribution Network is used. The Residual Consumption gas amounts for the Distribution Network shall be calculated by deducting from the volumes of metered gas at the Transition Point between the Transmission Network and the Distribution Network the metered gas amounts of the Daily Read Metering

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Sites of the Distribution Network in question. The amounts of gas are converted into energies by multiplying them by the calorific values of the Transition Point between the Transmission Network and the Distribution Network.

b) Distribution Network to which a Biogas Entry Point is connected

The Distribution System Operator is responsible for the division of the Distribution Network Metering Sites into one or more measurement areas and determines the calorific values for each measurement area. The Residual Consumption gas amounts for the Distribution Network shall be calculated by adding together the amount of gas at the Transition Point between the Transmission Network and the Distribution Network multiplied by the calorific value of the Transition Point and the metered amount of gas of the Biogas Entry Point multiplied by the calorific value of the Biogas Entry Point and by deducting from this sum the metered amounts of gas of the Distribution Network's Daily Read Metering Sites converted into energies using the calorific value of the measurement areas of each Metering Site.

c) Two Distribution Networks form a "circular" network, i.e. the Distribution Networks can be physically connected to each other and both Networks also have a connection to the Transmission Network

In a balance settlement, the gas amounts from Transition Point measurements of these two Distribution Networks are added together, assuming that the same calorific value can be used for the Transition Points and all Metering Sites. The Distribution Network's Residual Consumption gas amounts are calculated as if it was a single Network, that is, the metered gas amounts of both Networks' Daily Read Metering Sites are deducted from the sum of the Transition Point measurements between the Transmission Network and the Distribution Network. The amounts of energy are obtained by multiplying the amounts of gas by the calorific value applied to the Transition Points.

d) Two Distribution Networks form a "chain", i.e. there is a Distribution Network Transition Point between the two Distribution Networks and only one of the Networks is connected to the Transmission Network

In a balance settlement, the amounts of gas are determined to the Distribution Network that is connected to the Transmission Network by deducting from the Transition Point measurement between the Transmission Network and the Distribution Network the metered amount of gas of the Transition Point between the Distribution Networks. The Residual Consumption gas amount of the Distribution Network connected to the Transmission Network is obtained by deducting from the amount of gas referred to above the metered gas amounts of the Daily Read Metering Sites of the Distribution Network in question. The Residual Consumption gas amount for the latter Distribution Network is calculated by deducting from the amounts of metered gas at the Transition Point between the Distribution Networks the metered gas amounts of the Daily Read Metering Sites of the Distribution Network in question. All amounts of gas are converted into energies by using the calorific values of the Transition Point between the Transmission Network and the Distribution Network.

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6 Wholesale market information exchange

Wholesale market information exchange is centralized to take place on the Portal of the Transmission System Operator with System Responsibility.

On the Portal, Shippers and Traders may, among other things, use the portal to:

- update their Master Data;
- notify of Balance Group memberships, approve Balance Group members and terminate Balance Group memberships;
- accept and terminate Market Participant Relationships;
- order Capacity (Shippers only);
- submit Trade Notifications and Nominations (Shippers only);
- monitor their balance settlement account and Capacity Order (Shippers only) situation;
- receive information and forecasts from the Transmission System Operator with System Responsibility;
- monitor their completed and open payments and compensations concerning system services, capacity and taxation.

Transmission Network End Users, Retailers, Biogas Injecting Parties and Distribution System Operators may, among other things, use the Portal to:

- update their Master Data;
- notify and terminate Market Participant Relationships (for Distribution System Operators only when there are Daily Read Metering Sites in the Distribution Network);
- monitor their measurement data (Transmission Network Metering Sites and Biogas Entry Points, for Distribution System Operators only measurements at Transition Points between the Transmission Network and Distribution Network);
- receive information and forecasts from the Transmission System Operator with System Responsibility;
- monitor their completed and open taxation-related payments (does not apply to Retailers and Biogas Injecting Parties).

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6.1 Shippers' and Traders' electronic messages

Shippers and Traders may also use electronic messages (Edig@s XML version 5.1 and AS4 protocol) for their Nominations and Trade Notifications. For Shippers and Traders to be able to use electronic messages, it is required that they comply with the information exchange standards of the Transmission System Operator with System Responsibility (national application of Edig@s) and successfully pass the information exchange tests set by the Transmission System Operator with System Responsibility. The standards for Trade Notifications and Nominations was published in June 2019 and can be found at kaasumarkkina.fi. The Transmission System Operator with System Responsibility will open the Edig@s testing service and provider guidelines for its use in October 2019.

7 Retail market information exchange

Under the Natural Gas Market Act (587/2017 as amended), the centralized information exchange of the retail market is a task of the Transmission System Operator with System Responsibility. Electronic messages are not used in the retail market.

The Transmission System Operator with System Responsibility maintains the Register of Metering Sites for the retail market on the Gas Data Hub. Distribution System Operators and Retailers are responsible for updates to data in the Register of Metering Sites. Metering Site register data on all excluding kitchen cooker customers shall be maintained in the Register of Metering Sites.

Distribution System Operators shall submit the measurement data from all Daily Read Metering Sites to the Gas Data Hub in accordance with the balance settlement schedule. This data is used to calculate the quantities of energy required for invoicing for Retailers, Biogas Injecting Parties of Biogas Entry Points connected to Distribution Networks, and Distribution System Operators. The Gas Data Hub is also tasked with providing Shipper-specific sum data for the balance settlement of the entire system.

7.1 Balancing period and its impact on measurement and invoicing

Following the opening up of the market, the retail market balancing period shall be the Gas Day, which commences at 07:00 am Finnish time and ends on the following day at 07:00 am. This means that moves, disconnections and changes of seller shall become effective as of 7:00 Finnish time on their first effective date. Correspondingly, their effectiveness ends at 07:00 am on the calendar day following their last effective date. In the future, the previous invoicing period based on calendar months shall be replaced by the Gas Month, which commences at 07:00 am on the first day of the calendar month and ends at 07:00 am on the first day of the following calendar month.

Distribution System Operators shall provide the Transmission System Operator with System Responsibility with measurements from all Daily Read Metering Sites either as hour- or day-specific measurement time series depending on the types of measurement time series available from the Metering Sites. The Transmission System Operator with System Responsibility shall convert the day-specific time series into hours by dividing the day-specific values by 24 h. This means no

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hourly profiles are used for the conversion. The reading of day-specific measurements does not necessarily need to precisely take place immediately after 07:00 am. As regards balance settlement, the most important thing is to keep the time of reading as constant as possible so that the consumption always covers 24 h (or 23 or 25 hours when changing to summer time and daylight saving time).

7.2 Determining consumption of Non-Daily Read Metering Sites

A Distribution System Operator shall be responsible for the reading of measurement data of its Distribution Network's Non-Daily Read Metering Sites, processing and registration of measurement data, conversions into energies, and submission of data to the Retailer with Delivery Obligation. The Distribution Network's Retailer with Delivery Obligation shall agree with the Distribution System Operator on how data is delivered between the Participants. The Distribution System Operator and the Retailer with Delivery Obligation may agree with each other on how the Distribution System Operator delivers to the Retailer with Delivery Obligation the Metering Site-specific consumption estimates and, after the reading of measurement data, the results of Reconciliation used to correct the difference between consumption estimated Metering Site-specifically and the measured consumption.

7.3 Data exchange regarding retailing of biogas

Retailer is obliged to report Metering Site specific biogas consumptions to the Distribution System Operator on a monthly basis, so that the Distribution System Operator is able to invoice natural gas related taxes and security of supply fees from the Distribution Network End Users. Data concerning biogas consumption is not maintained in the Gas Data Hub.