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**Sent:** Wednesday, March 4, 2020 5:07 PM

**To:** SPRK <sprk@sprk.gov.lv>

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balance <balance@scener.eu>; Kaspars.Skrabans@conexus.lv

**Subject:** Consultation document on Inculkans

Dear Sirs,

In general it seems like a reasonable approach as there seems to be no big changes except addition of capacity transfer product for 1 year bundled product and restriction to move gas between different products in my understanding. On behalf of Baltic Energy Partners OÜ I would like to give following comments/questions:

- 1) What is the overbooking management mechanism for 1 year bundled product - pro-rata reduction or first-come-first served principle? Not clear from presentation.
- 2) What is the planned injection congestion management principle - pro-rata reduction or first-come-first-served? Not clear from presentation. If pro-rata then when the "orders book" will be closed? If pro rata then how long ahead can the injection capacity be booked or is it basically coming together with nominations?
- 3) Is the logic of 1 year bundled product pricing the same as 2019/2020 season - the tariff will be reduced based on revenue received from booked capacity? If yes, is there also a minimum price as in 2019/2020 season?

Regards,

Marko Allikson

Baltic Energy Partners OÜ