

Sabiedrisko pakalpojumu regulēšanas komisija
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2018-10-12 Nr. SD/2018-398
 To public consultation 2018-10-02

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RESPOND TO THE PUBLIC CONSULTATION ON THE AMENDMENT OF RULES OF NATURAL GAS TRANSMISSION SYSTEM

With this letter UAB LIETUVOS ENERGIJOS TIEKIMAS expresses its opinion on proposed amendments of rules of natural gas transmission system.

Current Rules No.	Current wording	Draft proposal	Our proposal
157	If the system user does not agree with the transmission system operator's findings regarding the system user's non-compliance with the credit rating, the system user may submit to the transmission system operator a relevant proof of its creditworthiness. Such evidence may be submitted in the form of an auditor's certification, a certification of sufficient liquidity by a financial service provider, a current annual report or any other information pertaining to the system user's creditworthiness.	Delete second sentence of paragraph 157.	It is beneficial both to system operator and a system user to know what is meant by wording "relevant proof". We suggest to keep current wording as being more explicit.
Annex 2 par. 5.3 and Annex 3 par. 7.1	By the 10 th day of each month, the Transmission system operator shall send to the System user an invoice...	to replace the figure "10" the number "15"	We believe natural gas suppliers are under pressure to receive and register the invoices by certain date of the month for financial reporting reasons. In our case 10 th of the month is rather

			late, nevertheless, we appreciate System operator usually providing invoices earlier than that. Making it by the 15 th is not competitive and does not seem as an improvement in customer service.
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Chief Executive Officer



Mantas Mikalajūnas

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