



# GSA Platform Report

gas year 2020/2021

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## 1. Executive Summary

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The past gas year was primarily marked by the COVID-19 pandemic caused by the SARS-CoV-2 virus. Communication with customers was made more difficult due to many restrictions put in place to prevent the spread of the pandemic. However, we were able to continue our annual satisfaction surveys and conduct online workshops with customers. This has allowed the GSA Platform to continue its dialogue with customers and to respond to the demands and expectations they reported.

In the past gas year, the GSA Platform started the process of technical connection of a new operator, i.e. AB Amber Grid, which, together with the Gas Transmission Operator GAZ-SYSTEM S.A., will offer on the GSA Platform the capacity at the Santaka IP point, at the junction of the gas systems of Poland and Lithuania. IT implementation works on the Lithuanian side were completed at the end of Q3 2021. Testing and final implementation of the solution in the back-end system on the part of AB Amber Grid are scheduled for the first half of 2022.

During the past gas year, the GSA Platform offered new and additional functionality to its customers. They include, inter alia:

- adding a contract number during user transactions on the secondary market in the case of cancellation requests and auctions with conversion of unbundled capacity to bundled capacity and conversion of interruptible to firm capacity,
- allowing cancellation requests for less than one month that is one gas day.

We invite you to read the report.

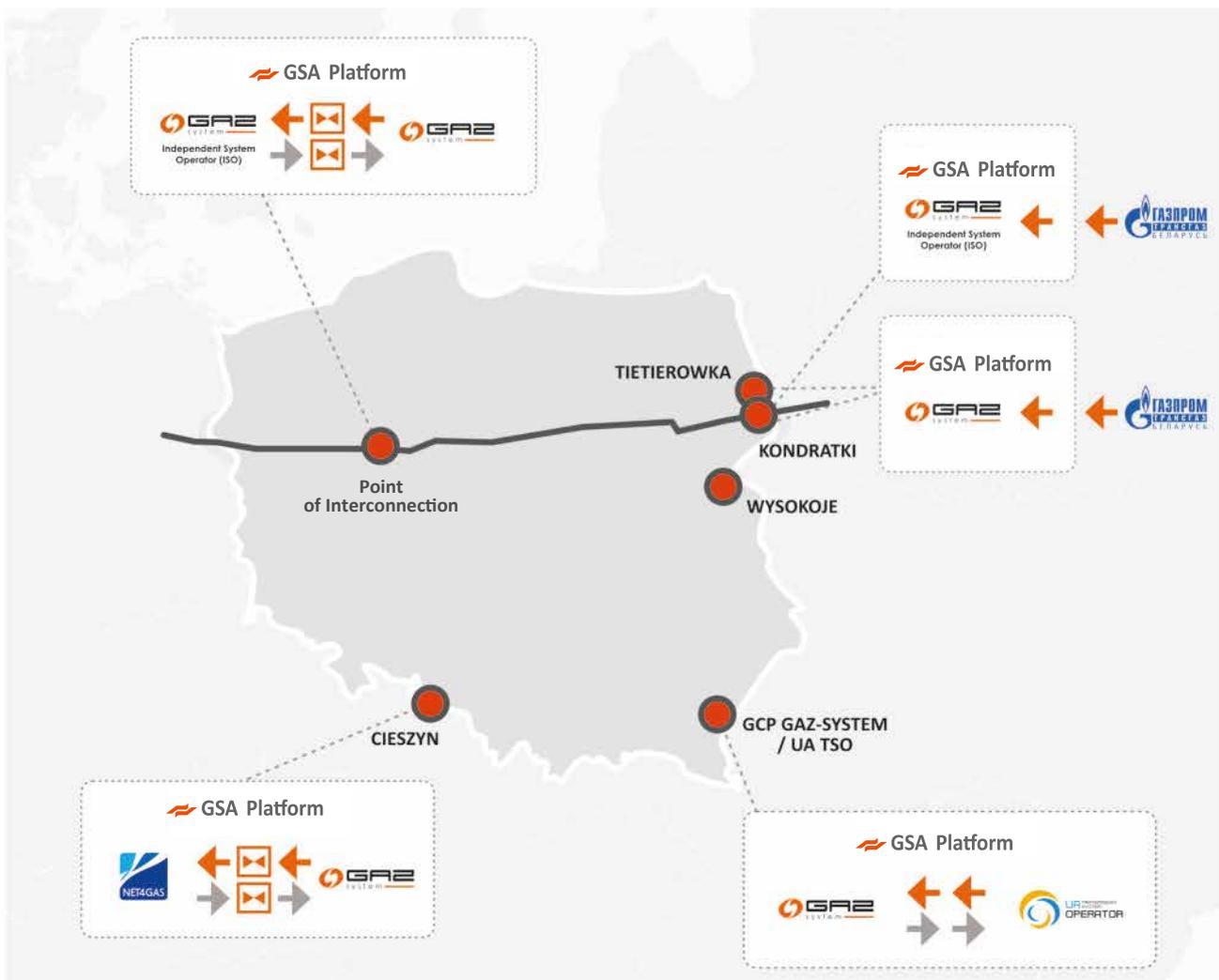


## 2. General information on the GSA Platform

The GSA Platform is an EU-compliant online platform for booking gas transmission capacities in the natural gas transmission systems. It provides a single tool for Gas Transmission System Operators for auctioning capacities of interconnection points they manage, allowing transmission system users to reserve capacity on the primary and secondary markets.

### 2.1. Scope of services

Through having participated in auctions, market participants may reserve, on the GSA Platform, capacity at interconnection points provided by GAZ-SYSTEM S.A. which serves as the operator of the national transmission system (GAZ-SYSTEM) and the operator of the Polish section of the Yamal – Europe transit gas pipeline system (GAZ-SYSTEM ISO). The GSA Platform also provides the capacity offered by the Czech operator NET4GAS s.r.o. as part of the bundled product offered on the Cieszyn interconnection point, as well as the capacity of the transmission system operator of Ukraine “Gas TSO of Ukraine” LLC insofar as the virtual point “GCP GAZ-SYSTEM/UA TSO”. In 2022, the first short-term products will be offered on the Poland-Lithuania connection.



\* A new interconnection on the Poland-Lithuania border (GIPL) is planned to be operational in 2022.

\* The first GIPL capacity auctions are scheduled to begin in April 2022.

## 2. General information on the GSA Platform

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The capacity is offered on the GSA Platform in the form of, either, yearly, quarterly, monthly, daily and intraday products, as well as of available offers from the secondary market. Any capacity reservation solutions provided by the GSA Platform are available to each and every transmission system operator who are interested in utilising tools tailored to its technical and market requirements, while maintaining favourable price conditions.

Market participants may participate in the auctions for free and the participation is based on communication standards using open protocols and messages (AS4, edig@s 5.1), thus ensuring ease of integration and system transparency. Either the stability, efficiency, and security of this system are guaranteed by 24/7 technical support and confirmed by international security and data protection standards (including but not limited to ISO/IEC 22301:2019, ISO/IEC 27001:2017).

The cost methodology, based on the synergy effect, offers a simple, yet safe and effective tool for capacity reservation. Furthermore, the GSA Platform satisfies any and all requirements of EU regulations, including those in terms of the provisions articulated in the network codes for the natural gas market. On top of that, the Agency for the Cooperation of Energy Regulators (ACER) has recognised the GSA Platform as an Organised Market Place in the light of the provision of REMIT Implementing Regulation.



1. Regulation (EU) No. 1227/2011 of the European Parliament and of the Council of October 25, 2011, on wholesale energy market integrity and transparency (REMIT).

## 2. General information on the GSA Platform

### 2.2. What makes us different

The GSA Platform purpose is to provide operators and users cooperating with us with services of the highest standard and safety. Specifically, we are focused on making our services competitive in terms of price and being constantly tailored not only to the needs of our clients but regulatory requirements as well.



 <p><b>FLEXIBILITY</b> we are open to changes and adapt functionalities to our clients' needs</p>	 <p><b>USE OF OPEN PROTOCOLS</b> extensive interface and data exchange based on publicly available protocols and formal (AM4, edig@s)</p>	 <p><b>CONVENIENT TO USE</b> ergonomic interface allows for comfortable and easy use of the system</p>	 <p><b>COST EFFECTIVENESS</b> efficient cost methodology allows operators to reduce expenses on IT tools for auctioning of bundled and unbundled capacity</p>
 <p><b>STABLE IT SYSTEM</b> easily accessible and reliable IT system for quick data access</p>	 <p><b>USER-FRIENDLY SYSTEM</b> available in multiple currencies and languages, easy to integrate with your internal systems</p>	 <p><b>EASY IMPLEMENTATION</b> easy integration with the operator's IT systems preceded by free system testing and training</p>	

### 2.3. Key data



<b>5</b> Number of TSOs	<b>137</b> Number of Shippers	<b>351</b> Number of Platform users
<b>599 903</b> Number of auctions held	<b>17</b> maximum number of participants in one auction	<b>49</b> maximum number of rounds in a given auction

### 3. Capacity allocation in the 2020/2021 gas year - summary

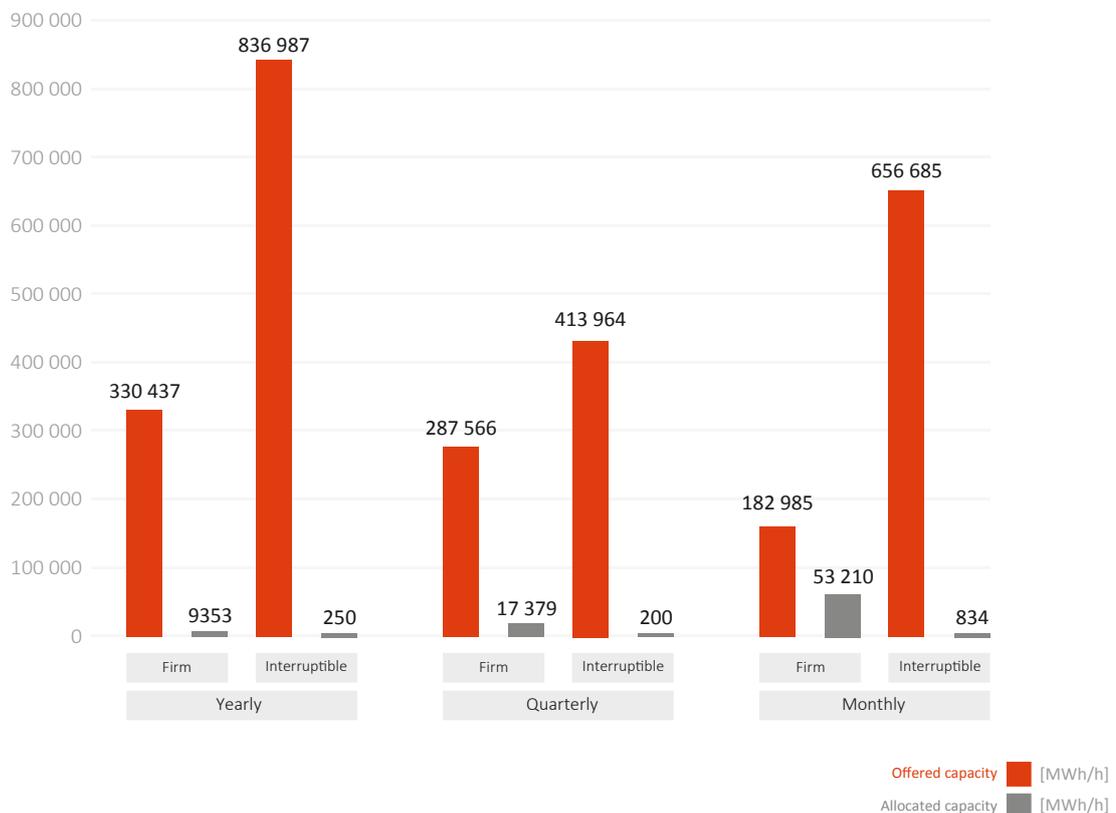
In the 2020/2021 gas year, a total of 76,074 auctions of firm capacity were held on the primary market of the GSA Platform, as well as 2,764 auctions of interruptible capacity. It was 77,900,036 MWh/h offered as part of the auctions of firm products, while the total interruptible capacity provided amounted to 34,049,748 MWh/h. The offered volume was contracted by market participants at the level of 416,306 MWh/h (firm capacity) and 110,899 MWh/h (interruptible capacity).

#### 3.1. Primary market long-term products

In the 2020/2021 gas year, under the long-term product auctions (yearly, quarterly, and monthly), a total of 800,988 MWh/h of firm capacity was made available, of which 79,942 MWh/h was reserved. Within that time frame, 77 yearly capacity auctions, 89 quarterly capacity auctions, and 103 monthly capacity auctions were held.

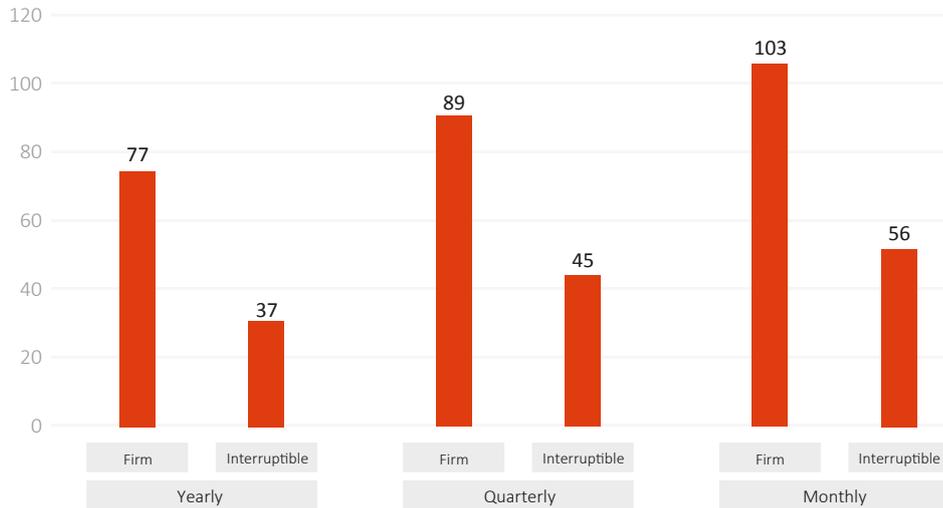
Interruptible capacity was offered under long-term products at the level amounting to 1,907,636 MWh/h and it was contracted at the level of 1,284 MWh/h. Within that time frame, GSA Platform users had an opportunity to participate in 37 yearly auctions, 45 quarterly auctions, and 56 monthly auctions of interruptible capacity auctions. A detailed breakdown of both the offered and reserved volume of long-term capacity is presented in the following chart:

Capacity allocation on the GSA Platform in the gas year 2020/2021 - long-term products



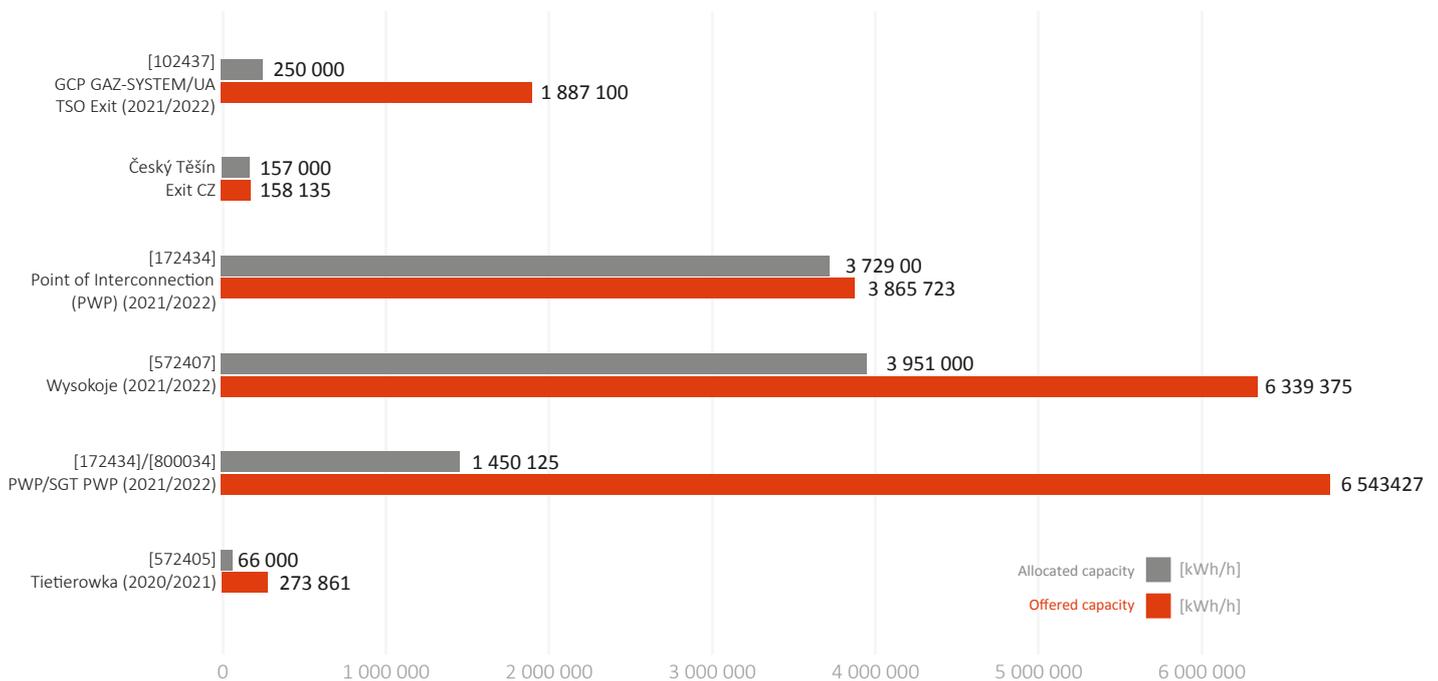
### 3. Capacity allocation in the 2020/2021 gas year - summary

Number of auctions in the 2020/2021 gas year



As far as auctions of long-term products are concerned, the auctions of the yearly product, which render the reservation of capacity for the next 15 gas years possible, are of particular importance for market participants. As an outcome of the auctions of the yearly firm capacity product commenced on 5 July 2021, and the auctions of the yearly interruptible product commenced on 19 July 2021, the following volumes were booked by market participants:

Summary of annual auction results for 2021/2022 gas year

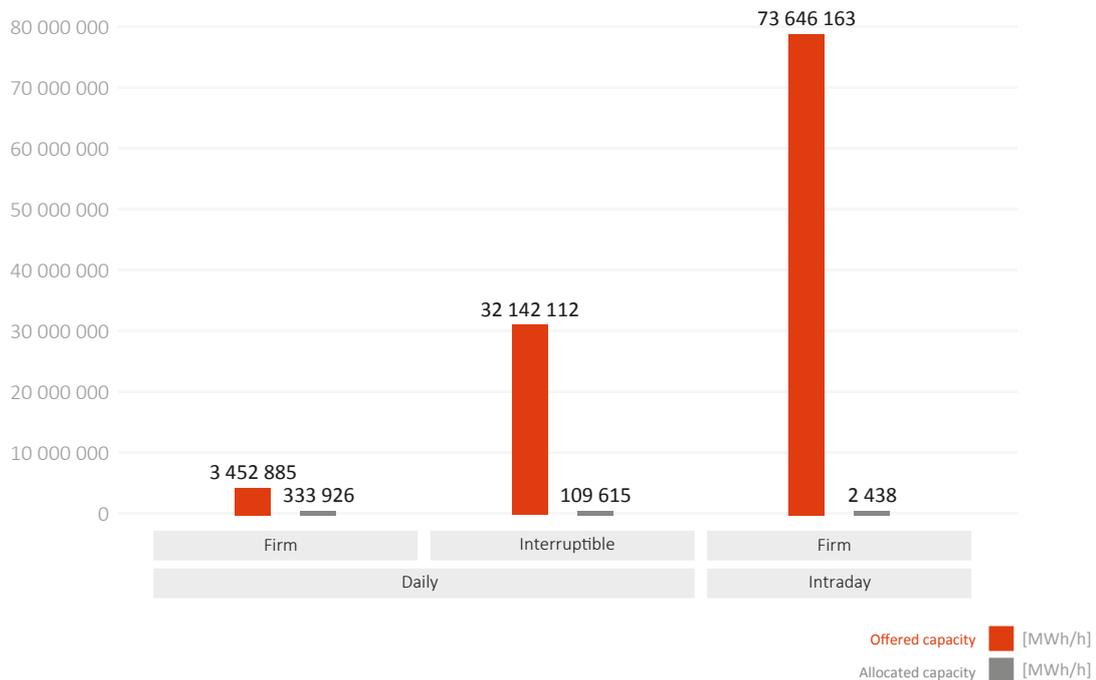


### 3. Capacity allocation in the 2020/2021 gas year - summary

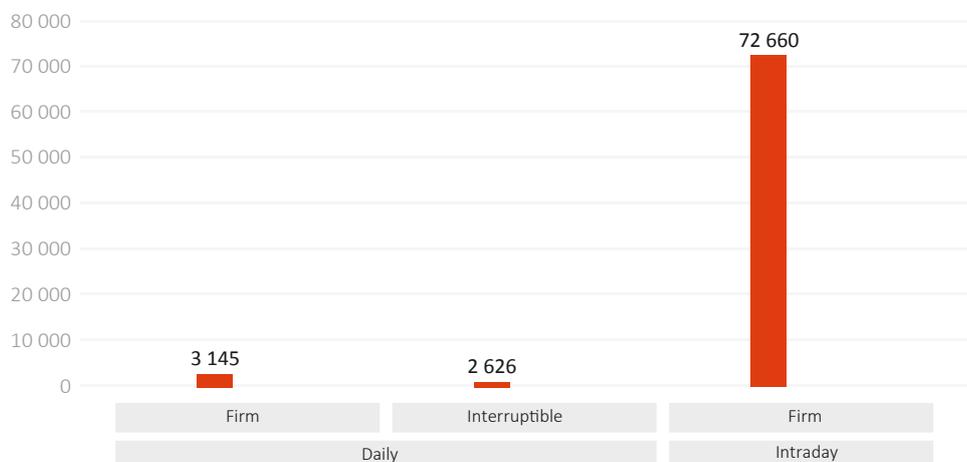
#### 3.2. Primary market short-term products

Within the framework of the auction of short-term products (daily and intraday), 77,099,048 MWh/h of firm capacity was made available, of which 336,364 MWh/h was contracted. In the 2020/2021 gas year, 3,145 auctions of daily products of firm capacity, 2,626 auctions of interruptible daily products and 72,660 auctions of intraday product were conducted. A detailed breakdown of both the offered and booked volume of short-term capacity is presented in the following chart:

Capacity allocation on the GSA Platform in the gas year 2020/2021 - short-term products



Number of auctions in the 2020/2021 gas year



Ever since the launch of the GSA Platform in 2014 until the end of the 2020/2021 gas year, 599,903 auctions have been carried out.

### 3. Capacity allocation in the 2020/2021 gas year - summary

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#### 3.3. Secondary market

In the 2020/2021 gas year, we observed an increase in interest and turnover on the secondary market on the GSA Platform, under where users are able to use three types of pre-allocated capacity: OTC (Over-The-Counter), FCFS (First Come First Served) and Call For Order. Within the time frame from 1 October 2020 to 30 September 2021, as many as 242 offers of secondary market capacity resale were submitted (188 offers under the FCFS and 54 offers under the OTC procedures), of which 95 ended with concluding a transaction (48 under OTC and 47 under FCFS, respectively)



### 4. New operator and supported interconnection

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In December 2020, we signed an agreement with the Lithuanian gas transmission system operator AB Amber Grid LLC to hold a capacity auction on the GSA Platform on the new interconnection at Santaka point, which will be made available as a result of the GIPL (Gas Interconnection Poland-Lithuania) project, and to establish a physical interconnection point at the Polish-Lithuanian border (bidirectional Poland-Lithuania GIPL Entry/Exit Point).

The start-up of the Poland-Lithuania border interconnection (GIPL) is planned for 2022. The first annual auctions of Poland-Lithuania interconnection capacity are planned for launched in the gas year 2022/2023 in July 2022, and then, in subsequent auction procedures conducted in accordance with the requirements of the European Network Code on Capacity Allocation Mechanisms in Gas Transmission Systems (Commission Regulation (EU) 2017/459 - CAM NC) and the auction calendar prepared by ENTSOG.

The first capacity allocated through the GSA Platform will be short-term products offered in April 2022.

## 5. Regulatory framework

### 5.1. Choice of platform on the Poland-Germany connection

As per Article 37(1) of CAM NC, transmission system operators shall offer capacity on a single online booking platform. In the event of disagreement between operators as to the single platform on which capacity is to be offered, CAM NC provides for a special procedure (Article 37(3)). As part of this procedure, the ACER, by virtue of Decision No. 11/2018 of 16 October 2018, selected the GSA Platform as appropriate one to have offered capacity at the German-Polish border for the next three years. ACER Decision No. 11/2018 is available here. 

Decision No. 11/2018 was appealed by PRISMA GmbH Platform. On 22 February 2019, the ACER Board of Appeal (ACER BoA) published a decision insofar as the appeal lodged by the PRISMA GmbH platform against ACER's decision No. 11/2018, by virtue of which the GSA Platform was deemed appropriate for auctioning the capacity on the Polish-German border for the next 3 years. The ACER BoA repealed the Agency's decision on procedural grounds at the stage where ACER was dealing with the case and referred the case back to the ACER's Director for reconsideration. The basis for the repeal of the decision was ACER's failure to duly document that the evaluation of platform offers had been carried out in the manner indicated by the Agency. The ACER BoA stipulated that if the platform had indeed been selected in the manner indicated by ACER, the evaluation method had been non-discriminatory. The ACER BoA did not contest the substantive premises of the selection of the GSA Platform, which solidifies its quality and cost-effectiveness.

The ACER BoA pointed out to the ACER's Director two options under which the proceeding should be supplemented: repeating the procedure from the moment of evaluation (i.e., re-evaluation of submitted offers) or conducting new proceedings. In a communication published on 22 February 2019, ACER announced the choice of the second path of option. ACER Appeals BoA's Decision No. A-002-2018, dated 14 February 2019, is available here. 

As given rise by the repeal of Decision No. 11/2018, the ACER initiated new proceedings serving to select a platform for capacity reservation and, by virtue of decision No. 10/2019 of August 6, 2019, selected the RBP platform as an appropriate one for capacity allocation on the Polish-German border for the next 3 years. The full decision is available here. 

On 7 October 2019, the GSA Platform Operator has filed an appeal against ACER Decision No. 10/2019. The ACER Board of Appeal, by virtue of decision No. A-006-2019 of February 7, 2020, upheld ACER's Decision No. 10/2019 and dismissed the appeal filed by the GSA Platform Operator. The text of the decision is available here. 

The GSA Platform Operator lodged a complaint against the decision of the Board of Appeal No. A-006-2019 to the Court of First Instance, the Court of Justice of the EU, pursuant to Art. 263 of the Treaty on the Functioning of the European Union. The operator is awaiting resolution of the complaint.



## 5. Regulatory framework

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### 5.2. Proposed changes under the “Fit for 55” and “Hydrogen and decarbonised gas market” packages

In 2021, intensive work was underway in the European Union to prepare new legal regulations in the area of climate policy and the gas sector. The GSA Platform Operator monitors these processes on an ongoing basis considering their impact on the natural gas market in EU Member States, as well as the potential for future expansion of its services to low-carbon, renewable gases and hydrogen.

In July 2021 the Commission published the “Fit for 55” legislative package. It includes the amendment of more than a dozen legal acts including, among others: the EU ETS Directive 2003/87, the REDII Directive 2018/2001, or the Energy Taxation Directive 2003/96, which will be replaced by new legislation. These changes are intended to enable the Union to achieve its goal of at least a 55% reduction in greenhouse gas emissions from 1990 levels by 2030 and, in the longer term, climate neutrality by 2050.

From March to June 2021 also a public consultation was held regarding the assumptions of a new gas package called “Hydrogen and decarbonised gas market package”. Its main objective is to create a regulatory basis for the functioning of the hydrogen market, as well as to facilitate access to the market for renewable and low-carbon gases. The amendments are to cover, among others: the Gas Directive 73/2009, Regulation 715/2009 and and SoS Regulation 2017/1938. The Commission is scheduled to publish the draft legislation comprising this package in December 2021.



## 6. Security and quality of services

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What is one of the GSA Platform's priorities is to have provided its users and operators with the highest information security. The procedures and practices we apply are subject to audits and certification processes, which confirm that the quality of the services rendered and the business continuity management system is compliant with international standards of data security and protection.

### 6.1. Certificates and confirmation of the quality of services rendered

ISO 22301:2019 and ISO/IEC 27001:2017

In H2 of 2021 recertification audits were held, which confirmed that the GSA Platform meets the requirements of ISO 22301:2019 (BCMS) and ISO/IEC 27001:2017 (ISMS) standards due to the implemented procedures and good practices insofar as information security management and business continuity management through an appropriate information security policy and the integrity between the management system and the processes under operation.

The assessment results in the area of maintenance, modification, development, and service rendering on the GSA Platform are positive:

-  The Information Security Management System (ISMS) is compliant with ISO/IEC 27001:2017 (ISMS) and confirmed by the PL013087/P certificate
-  The Business Continuity Management System (BCMS) is compliant with ISO 22301:2019 and confirmed by the BCMS 635966 certificate.

Audit of compliance of GSA Platform processes with ACER requirements

Bearing in mind the ACER requirements for platforms used to make capacity reservations on connections (entry and exit points from the territory of the Republic of Poland), in particular in terms of ensuring an appropriate level of information security, including compliance with applicable legal requirements, in H2 of 2021, the GSA Platform was subject to a recertification audit conducted by an accredited certification body, which resulted in obtaining a certificate confirming compliance with the requirements of ISO/IEC 27001:2017 (ISMS). The subject of the audit examination were, among others, such aspects as: security in the processes of platform maintenance, development and ensuring continuity of services using the GSA Platform.

### 6.2. Managing Users on the GSA Platform

The Platform User acting as Organisation Administrator of the relevant TSO or System User has a permanent view of the list of Platform Users within their own organisation and has the possibility to accept, block, delete accounts and grant the role of Organisation Administrator or Observer to active Platform Users.

## 7. Service development and cooperation with users

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The GSA Platform Operator strives to develop the services and operability of the auction platform based on current proposals and comments submitted by system users and operators, as well as based on cyclical workshops and customer satisfaction surveys. Feedback obtained in this manner is used as part of developing the GSA Platform Development Plan, as well as to continuously improve service standards and functionalities available to users.



### 7.1. Workshops for users and operators

On 8 December 2020, as part of the GSA Platform FORUM series, another meeting for platform users and operators was organised. Due to pandemic restrictions, the meeting was held online. The following topics were raised, among other things:

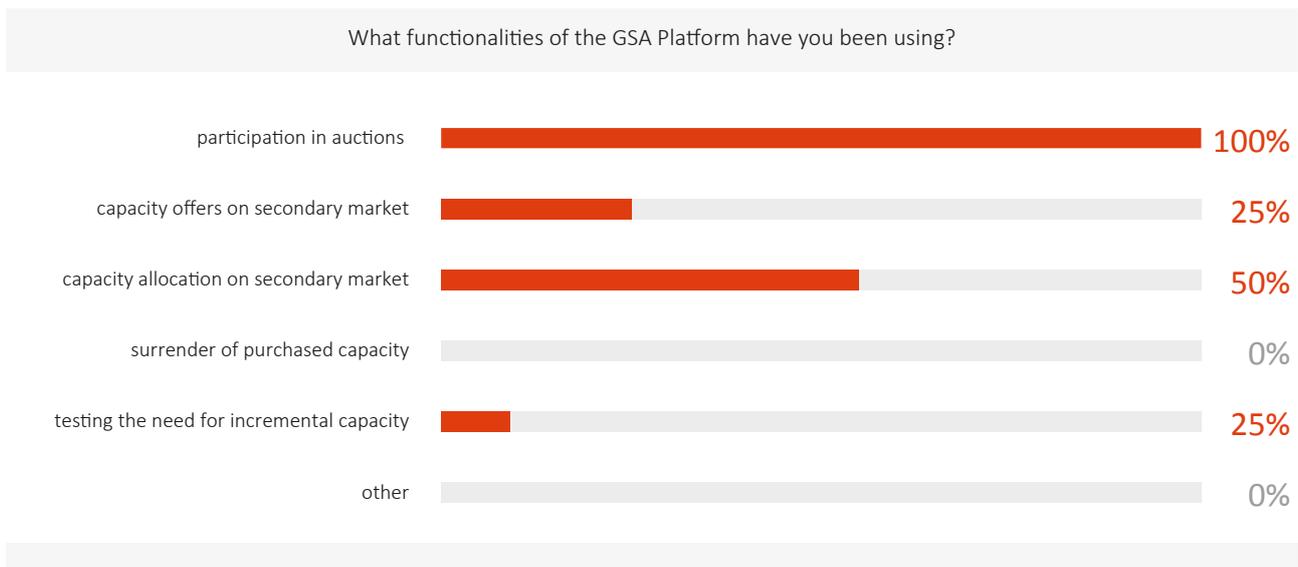
-  development of the service area provided by the platform,
-  the summary of primary and secondary market auctions conducted in the 2019/2020 gas year,
-  current issues related to the functioning of the platform in the EU environment,
-  changes made to the visual identity of the platform,
-  results of a previous and preview of an upcoming customer satisfaction survey.

## 7. Service development and cooperation with users

### 7.2. Results of the 2020 GSA Platform user satisfaction survey

The GSA Platform User Satisfaction Survey for the 2019/2020 gas year was conducted in the last quarter of 2020.

The majority of GSA Platform Users participating in the survey said they use the platform by participating in auctions, and half of the respondents confirmed they also use the option to purchase capacity on the secondary market.



According to GSA Platform users, the Platform is very intuitive to use and its interface is clear and readable. Users are mostly positive about the overall efficiency of the tool.

More than half of respondents indicated that they use the platform's helpdesk, mostly through phone and email contact. The level of service of reports was rated very high by the respondents in all aspects, i.e.:

-  employee's involvement in solving the problem
-  problem solving time
-  speedy response of the employee to the report

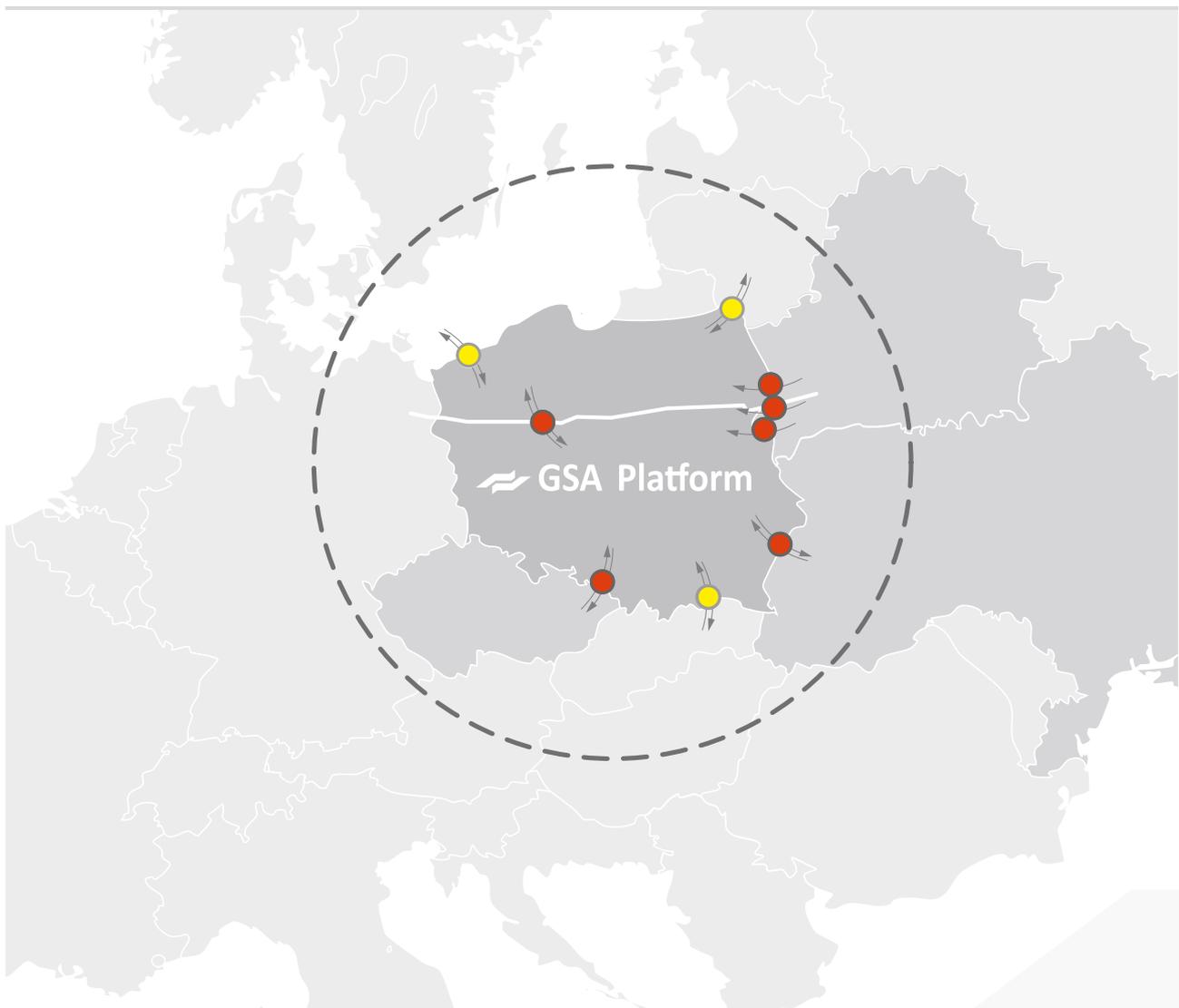
Users overwhelmingly do not see the need for additional training in the operation of the GSA Platform, and some users have no opinion on the subject. More than half of the respondents are aware that the GSA Platform offers a testing environment and most use it. Half of the respondents are willing to participate in testing new features, and all of them would like to receive a newsletter informing them about the most important issues concerning the GSA Platform.

The GSA Platform User Satisfaction Survey for the 2020/2021 gas year was launched on 1 December 2021.

## 7. Service development and cooperation with users

### 7.3. Offer for new users and operators

The GSA Platform offer is addressed in particular to operators who are faced with making a decision on selecting a solution for auctioning capacity for existing or new interconnections. Our team grants the TSO support in the implementation of the requirements of EU network codes and the development of their internal and, consequently, the European gas market. We are also open to deploying those solutions stemming from the requirements of national regulations and introducing functionalities tailored to the needs of operators and users. We strive to guarantee the highest standard of services in accordance with legal requirements, as well as to satisfy our clients with the use of the GSA Platform.

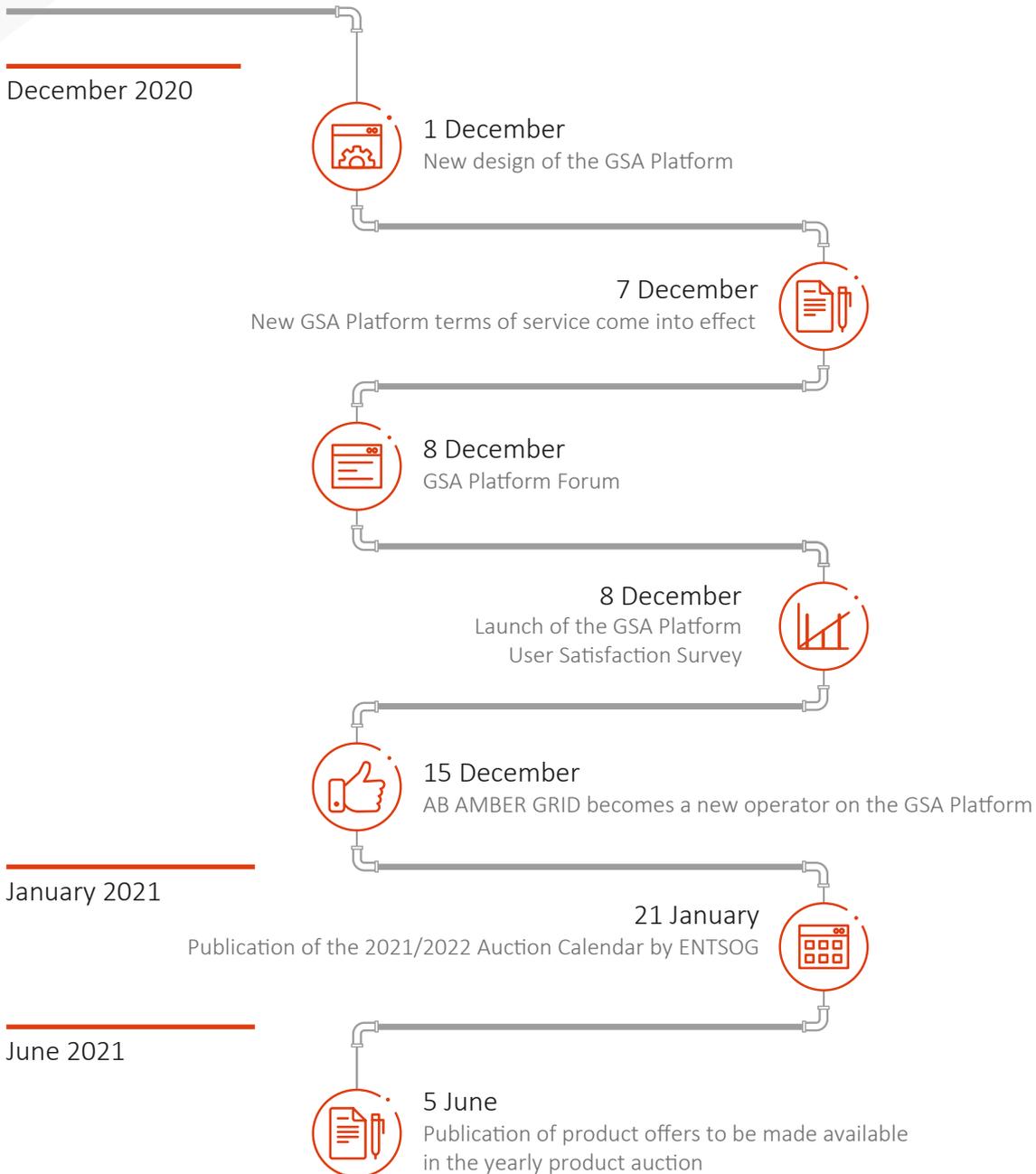


● GSA Platform operated IPs: Interconnection Points.

## 8. Summary

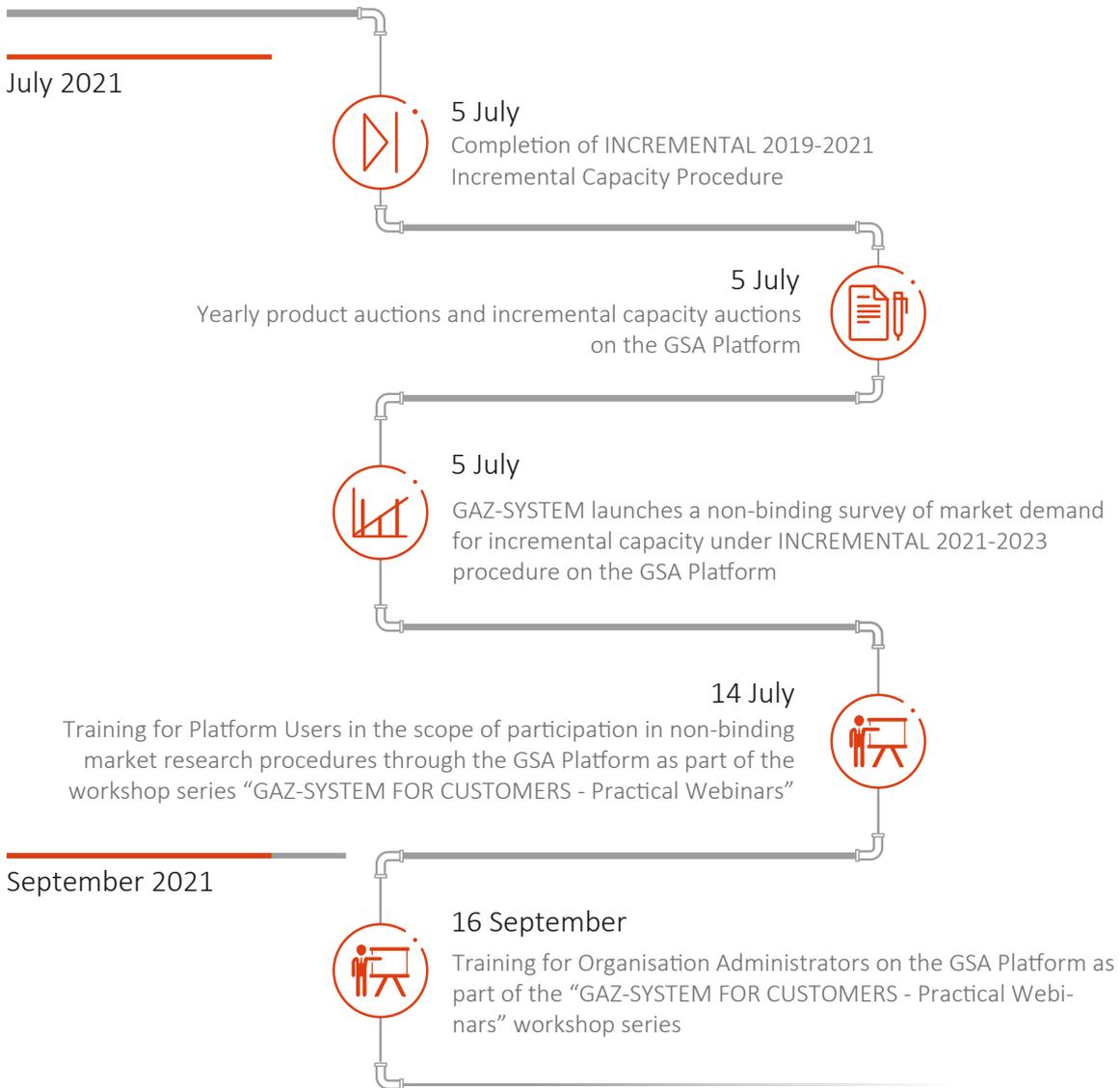
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### 8.1. Timeline



## 8. Summary

### 8.1. Timeline



## 8. Summary

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### 8.2. Contacts

Should you be interested in getting information about the GSA Platform, please contact us:





**GSA Platform**