

Bulgartransgaz
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15 April 2020

Subject: EFET¹ response to the consultation on the Business Rules and Communication Procedures under the Draft Interconnection Agreement for IP Strandzha/Malkoclar

EFET welcomes the long-awaited Interconnection Agreement that is to be concluded between the transmission system operators of Bulgaria and Turkey. We believe that this document is of utmost importance to the future development and integration of the gas markets in the region. We recognize and appreciate that a number of positive adjustments will need to be undergone by Botas to make the interconnection agreement truly serve its purpose and we would like to express our readiness to support the system operators in this process to the highest extent possible.

It is our understanding that a number of modifications will need to be implemented particularly by Botas, including implementation of Edig@s communication protocol, offering interruptible capacities on the IP in question, introduction of renomination cycles and using energy units. It is also our understanding that the Gas Day in Turkey will need to be redefined to facilitate capacity allocation and nominations on the border. We welcome this ambitious approach and perceive it as a very positive step on the way towards the development and expansion of the Turkish gas market.

To conclude, we applaud the ambitious approach presented in the Interconnection Agreement and we hope that it has been developed and will be processed further in close cooperation between Bulgartransgaz and Botas. We believe that extended cooperation with the Turkish authorities will be of paramount importance to further development of the gas markets in Southeast Europe.

Kind Regards,
On behalf of EFET TF CSEE-G



Davide Rubini,
Chairman of EFET TF CSEE-G

¹ The European Federation of Energy Traders (EFET) promotes competition, transparency and open access in the European energy sector. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and a competitive economy. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information: www.efet.org.