

Requirements for the structure and content of the report for the cost allocation assessment according to Article 5 of Regulation (EU) No 2017/460 and the final consultation according to Article 26 of Regulation (EU) No 2017/460 including annex

Annex 1

to the determination of requirements for implementation of the network codes on harmonised transmission tariff structures (Regulation (EU) No 2017/460) and on capacity allocation mechanisms in gas transmission systems and repealing Regulation (EU) No 984/2013 (Regulation (EU) No 2017/459) in incentive regulation (BK9-17/609)

of
19 July 2017

A Requirements for the structure of the report

The report must enable the Ruling Chamber to carry out the cost allocation assessment in accordance with Article 5 of Regulation (EU) No 2017/460 without obtaining further information and to carry out the final consultation in accordance with Article 26(1) of Regulation (EU) No 2017/460. The report and the annex must be produced using the organisational structure proposed in this appendix. The report must be written in German and in English. The report shall relate to the year 2020. In order to fulfil these requirements, the following items must always be included:

- 1 Description of the proposed reference price methodology
- 2 Indicative information on the parameters used in the proposed reference price methodology related to the technical characteristics of the transmission system
- 3 Values of the proposed adjustments for capacity-based transmission tariffs referred to in Article 9 and Article 4(2) of Regulation (EU) No 2017/460
- 4 Indicative reference prices calculated using the proposed reference price methodology
- 5 Components of the cost allocation assessments referred to in Article 5 of Regulation (EU) No 2017/460
- 6 Assessment of the proposed reference price methodology according to Article 7 of Regulation (EU) No 2017/460
- 7 Comparison of the proposed reference price methodology with the capacity weighted distance reference price methodology referred to in Article 8 of Regulation (EU) No 2017/460
- 8 Indicative information in accordance with Article 30(1)(b)(i), (iv) and (v) of Regulation (EU) No 2017/460
- 9 Information on non-transmission services
- 10 Indicative information in accordance with Article 30(2) of Regulation (EU) No 2017/460
- 11 Adjustments in accordance with Article 6(4) of Regulation (EU) No 2017/460
- 12 Other explanations

The above expressly constitute minimum requirements, which may be supplemented by further statements that are relevant to the preparation of the report in the network operator's view in the interests of full transparency. The Ruling Chamber reserves the right to conduct a subsequent data collection to obtain updated values.

In order to protect confidential industrial or business information provided by third parties (eg forecasted capacities at exit points to end users), any such information must be removed from the consultation document before it is submitted. Fields for highlighting confidential information given by third parties are provided on the data entry form. It should be noted that data that is subject to publication obligations is not classified as confidential information.

B Requirements for the content of the report

The mandatory minimum content of each section of the report within the above structure is set out in the following.

Re 1: Description of the proposed reference price methodology

Article 26(1)(a) of Regulation (EU) No 2017/460 stipulates that a description of the proposed reference methodology must be provided. This may generally be done with reference to operative provision 5 of this determination, but it may be necessary to address specific circumstances applying to the respective transmission system operator regarding implementation of the provisions set out in operative provision 5.

The Ruling Chamber points out that, in its opinion, contractual penalties arising from exceeding capacity limits, the reservation fee referred to in section 38 GasNZV and the lump sum for planning referred to in section 39 GasNZV merely constitute standard contractual arrangements or are terms of payment that do not form part of the reference price methodology.

Re 2: Indicative information on the parameters used in the proposed reference price methodology related to the technical characteristics of the transmission system

According to Article 26(1)(a)(i) in conjunction with Article 30(1)(a) of Regulation (EU) No 2017/460, the indicative information on the parameters used in the proposed reference price methodology related to the technical characteristics of the transmission system must be specified. This includes the parameters themselves, the transmission system operator's assumptions that gave rise to these parameters and the justification of the assumptions in accordance with Article 26(1)(a)(i) of Regulation (EU) No 2017/460.

The entries for the capacities at entry and exit points forecasted for the year 2020 that are relevant for the proposed reference price methodology must be inserted for each entry and exit point on spreadsheet C_Entry_Exit in the data entry form. A detailed and transparent explanation of the associated assumptions and justifications must be given in the report.

In light of the fact that the form requests different reference prices (separate application of postage stamp tariffs, separate application of postage stamp tariffs taking into account the provisions set out in Determination BK9-13/607 and joint application of postage stamp tariffs for each market area), differentiated data on forecasted daily average contracted capacities in each case may also be specified. According to operational provision 3(e) of Determination BK9-13/607 (horizontal cost allocation mechanism, "HoKoWä") dated 22 June 2016, adjustments may be made to the forecasted capacities during the joint consultation between the transmission system operators.

This capacity value should in principle be shown unweighted and not adjusted for price because any adjustments necessary for calculating a cost-covering price should be made using the adjustment constant referred to in Article 6(4)(c) of Regulation (EU) No 2017/460. Therefore only the forecasted daily average contracted capacities at all entry and exit points are relevant.

In the information on the forecasted capacities, in consideration of the provisions set out in Determination BK9-13/607 regarding comparability the capacities before and after weighting must be specified in accordance with the second sentence of operative provision 2 of Determination BK9-13/607. As the adjustments relevant for the year 2020 have not yet been set, the weighting may be based on the adjustment factors relevant for the year 2018.

The following entry point types may be selected:

- NKP (GÜP) – cross-border interconnection point
- NKP (MÜP) – market area interconnection point
- NAP (Ez) – connection of domestic production facilities

- NAP (Sp) – storage
- NAP (Bio) – biogas input
- NAP (LNG) – liquid natural gas

The following exit types may be selected:

- NKP (GÜP) – cross-border interconnection point
- NKP (MÜP) – market area interconnection point
- NAP (iB) – internal booking of a downstream distribution system operator
- NAP (Sp) – storage
- NAP (Lv) – end user connection

Points for which publication of the forecasted contracted capacity or of the technical capacity would jeopardise third parties' confidential industrial or business information must be identified by being selected on spreadsheet C_Entry_Exit.

To ensure plausibility, the x-coordinate and y-coordinate of the point must be stated for each entry and exit point. The projection method used must be specified on spreadsheet A_Allgemeine_Informationen (UTM zone 32N (see EPSG Code 25832) or Gauß-Krüger zone 3 (see EPSG Code 31467)).

In the case of the point ID, for the purposes of checking plausibility identical IDs must be specified as in the case of the query pursuant to Determination BK9-15/605 (in the latter case: NKP or NAP-ID).

Re 3: Values of the proposed adjustments for capacity-based transmission tariffs according to Article 9 and Article 4(2) of Regulation (EU) No 2017/460

According to Article 26(1)(a)(ii) of Regulation (EU) No 2017/460, the values of the proposed adjustments for capacity-based transmission tariffs pursuant to Article 9 of Regulation (EU) No 2017/460 must be specified.

To this end, all entry points from storage facilities and exit points to storage facilities must be identified as such on spreadsheet C_Entry_Exit. In addition, any discount of at least 50% applied to capacity-based transmission tariffs referred to in Article 9(1) of Regulation (EU) No 2017/460 must be stated. Where a discount greater than 50% is stated, a detailed and transparent explanation of the grounds must be given in the report under point 3 for each entry or exit point.

The same applies to any entry points from LNG facilities.

Additionally, the network operator must specify on spreadsheet C_Entry_Exit whether the point is an entry or exit point at gas storage facilities which allow access to more than one market area or to the market of a neighbouring country. At such points the network operator must always specify a capacity tariff without discounts. If the network operator does account for a discount at these points, under point 3 of the report a detailed and transparent explanation must be given of how the storage facility operator has proved or will prove to the network operator that discounted market area switching, border crossings and swaps via the storage facility are precluded in accordance with the provisions of Determination BK9-14/608. If it is expected that the network operator shall obtain revenues from transfer fees, these must be specified as other revenues on spreadsheet B_Allokation_EOG_u_KStR.

In addition, any proposed discounts arising from conditions for firm capacity products must be entered in spreadsheet C_Entry_Exit. Columns are already provided for short-distance tariffs, capacity with conditional firmness and allocability (bFZK), temperature-dependent capacity (TAK), firm capacity with restricted allocability (BZK) and firm, dynamically allocable capacity (DZK). Any

other capacity products with conditional firmness can be entered in other columns, and grounds must likewise be given. A detailed and transparent description of the conditions and their background and of the calculation of the discounts must be given under point 3. This must include a detailed description of how better utilisation of the transmission network will be achieved and ensured.

Re 4: Indicative reference prices calculated using the proposed reference price methodology

According to Article 26(1)(a)(iii) of Regulation (EU) No 2017/460, the indicative reference prices subject to consultation (Article 3 second sentence para 1 of Regulation (EU) No 2017/460) must be specified. To this end, the indicative reference price calculated using the proposed reference price methodology must be entered in spreadsheet C_Entry_Exit for each entry and exit point.

The indicative reference prices according to the proposed reference price methodology must be specified both for separate application and for joint application of the proposed reference price methodology for each market area. In the case of joint application, the transmission system operators within one market area must enter values agreed among themselves. To this end, the transmission system operators may commission a third party in line with the requirements set out in operative provision 3 of Determination BK9-13/607 of 22 June 2016 ("HoKoWä"). In addition, the indicative reference prices calculated by means of the proposed reference price methodology where the methodology is applied separately must be entered in spreadsheet C_Entry_Exit for each entry and exit point, taking account of the requirements set out in Determination BK9-13/607 of 22 June 2016 ("HoKoWä"). As above, this requires appropriate coordination between the transmission system operators.

Detailed and transparent information on how the indicative reference prices were calculated using the proposed reference price methodology in each case must be provided under point 4 of the report.

According to section 17(1) ARegV, the expected revenue cap for the year 2020 must be converted into tariffs for access to the energy supply networks. Section 17(1) ARegV stipulates that the set revenue cap must be converted into tariffs according to the rules laid down in part 2(2) and (3) GasNEV. The data necessary to describe the process of tariff calculation thus includes cost centre accounting according to part 2(2) GasNEV and cost unit accounting according to part 2(3) GasNEV.

As the revenue cap for the year 2020 has not yet been set, it must be estimated. In particular it will be possible to make use of values that have been applied for and values that have been consulted on from the procedure for determining the revenue cap for the third regulatory period and estimated adjustments according to section 4(3) and (4) ARegV. A detailed and transparent explanation of the procedure used for the estimation must be given in the report.

The revenue cap for the eventuality of separate application of the proposed reference methodology must be specified on spreadsheet A_Allgemeine_Informationen regardless of any compensation mechanism used in accordance with Article 10(3) of Regulation (EU) No 2017/460. The same applies to the main cost centre: network on spreadsheet B_Allokation_EOG_u_KStR.

Explanatory notes on cost centre accounting according to sections 11 and 12 GasNEV and annex 2 (re section 12 first sentence) GasNEV

Cost centre accounting is entered on spreadsheet B_Allokation_EOG_u_KStR of the data entry form. For the sake of simplification the main cost centres "non-transmission services" (within the meaning of GasNEV), "high-pressure network", "medium-pressure network" and "low-pressure network" are combined as one cost centre, "network"; there should be no further subdivision into subsidiary cost centres.

A transparent explanation of the allocation of individual revenues to the network and meter operation (including metering) cost centres must be given in the report, with reasons.

In accordance with Determination BK9-14/608, the capacity charges must be calculated from the revenues assigned to the "network" cost centre without the costs for the biogas neutrality charge referred to in section 20a GasNEV and the costs for the neutrality charge referred to in section 19a EnWG. Other revenues (rebooking charges at storage facilities according to Determination BK9-14/608, contractual penalties and if applicable further revenues) must be deducted on spreadsheet B_Allokation_EOG_u_KStR, because they do not constitute revenues to be used in the proposed reference price methodology. However, a detailed and transparent explanation of these circumstances must be provided under point 4 of the report.

The remaining revenues are the revenues from transmission services that are expected to be obtained from capacity-based transmission tariffs.

Explanatory notes on cost unit accounting (sections 13 ff GasNEV)

Cost unit accounting must be carried out according to the provisions set out in sections 13 to 16 GasNEV and sections 19 to 20b GasNEV.

Reference prices for firm capacities with a duration of one year must be calculated from the revenues assigned to the "network" cost centre using the requested methodologies.

These must be shown on spreadsheet C_Entry_Exit on the data entry form. The calculation of the reference prices must be documented and explained in detail, taking account of the proposed reference price methodology.

Re 5: Components of the cost allocation assessments referred to in Article 5 of Regulation (EU) No 2017/460

Article 26(1)(a)(iv) of Regulation (EU) No 2017/460 stipulates that the individual components of the cost allocation assessment referred to in Article 5 of Regulation (EU) No 2017/460 and the details of these components must be specified.

In accordance with Article 5(1)(a) of Regulation (EU) No 2017/460, the cost allocation assessment must be carried out with respect to transmission services revenue to be recovered by capacity-based transmission tariffs. According to Article 5(1)(a)(i) to (iv) of Regulation (EU) No 2017/460, the assessment may be based on the following cost drivers: (i) technical capacity, (ii) forecasted contracted capacity, (iii) technical capacity and distance or (iv) forecasted contracted capacity and distance.

The cost allocation assessment must be carried out on the basis of the proposed reference price methodology, Article 5(2) of Regulation (EU) No 2017/460. Because the proposed reference price methodology does not include distance as a cost driver, no information on distances is requested.

The potential cost drivers referred to in Article 5(1)(a)(i) and (ii) of Regulation (EU) No 2017/460 must be specified for each entry and exit point in spreadsheet C_Entry_Exit. This information has already been provided in relation to the forecasted contracted capacity, in accordance with point 2. The technical capacity for each entry and exit point must also be specified in spreadsheet C_Entry_Exit. The report must include a detailed and transparent explanation of the assumptions associated with the technical and forecasted contracted capacities. In addition, the revenues expected to be obtained from capacity tariffs at the point in question must be specified.

In light of the fact that the consultation covers multiple variants of the proposed reference price methodology, the point-specific revenues must be differentiated. For each entry and exit point it is necessary to specify the transmission services revenue, and within this, revenue from cross-system network use with separate application of postage stamp tariffs, separate application of postage stamp tariffs taking account of the provisions set out in Determination BK9-13/607 and joint application of postage stamp tariffs in one market area.

Prices resulting from the process referred to in Article 22 of Regulation (EU) No 2017/460 within the framework of potential redistribution mechanisms should not be used to determine the revenues, but rather the point-specific prices arising prior to these redistributions but after

adjustments on the basis of, for example, multipliers, discounts and seasonal factors and also after the adjustments referred to in Article 6(4)(a) to (c) of Regulation (EU) No 2017/460. As the adjustments relevant for the year 2020 have not yet been set, the adjustment factors relevant for the year 2018 may be used.

The Ruling Chamber shall also calculate the splitting of revenues on the basis of the network operator information on capacities and overall revenues in accordance with Article 5(5)(a) to (c) of Regulation (EU) No 2017/460. It cannot be ruled out that the transmission system operator may be able to provide a more precise allocation as a result of any product restrictions, for example. Detailed and transparent grounds must be given for any divergences.

The Ruling Chamber shall carry out the cost allocation assessment at network operator level or at market area level.

The sum of transmission services revenue where the proposed reference price methodology is applied separately taking into account the provisions set out in BK9-13/607 and the sum of transmission services revenue where the proposed reference price methodology is applied jointly may differ from the proportion of transmission services revenue expected to be recovered from capacity-based transmission tariffs and specified on spreadsheet B_Allokation_EOG_u_KStR); see also page 31 ff of Determination BK9-13/607 of 22 June 2016 ("HoKoWä").

Re 6: Assessment of the proposed reference price methodology according to Article 7 of Regulation (EU) No 2017/460

According to Article 26(1)(a)(v) of Regulation (EU) No 2017/460, in the course of the final consultation the proposed reference price methodology must be assessed in accordance with Article 7 of Regulation (EU) No 2017/460.

At this juncture the network operator is on the one hand given the opportunity to make timely comments on the proposed reference price methodology with respect to the requirements set out in Article 7 of Regulation (EU) No 2017/460. On the other hand, the network operator is obliged to demonstrate that the proposed reference price methodology conforms to the requirements set out in Article 7 of Regulation (EU) No 2017/460. The network operator must explain the conformity in more detail with regard to the provisions set out in Article 7(a) to (e) of Regulation (EU) No 2017/460. In so doing the network operator may make reference to the criteria listed in the template referred to in Article 26(5) of Regulation (EU) No 2017/460 and/or apply the network operator's own deliberations.

According to Article 26(1) of Regulation (EU) No 2017/460 it would have been possible to require the transmission system operators to carry out the consultation. In that case the network operator would have had the primary task of justifying its proposed reference price methodology in line with the criteria listed in Article 7(a) to (e) of Regulation (EU) No 2017/460. Against this background the Ruling Chamber considers the obligation imposed with point 6 to be justified. In light of the deliberations put forward by the transmission system operators, the Ruling Chamber shall carry out its own assessments and present them for consultation on the market in accordance with Article 26 of Regulation (EU) No 2017/460.

Re 7: Comparison of the proposed reference price methodology with the capacity weighted distance reference price methodology referred to in Article 8 of Regulation (EU) No 2017/460

According to Article 26(1)(a)(vi) of Regulation (EU) No 2017/46, because the proposed reference price methodology is other than the capacity weighted reference price methodology detailed in Article 8 of Regulation (EU) No 2017/460, a comparison of the methodologies must be carried out, including a comparison between the indicative reference prices referred to in Article 26(1)(a)(iii) of Regulation (EU) No 2017/460. In order to be able to perform a valid and transparent comparison, detailed and transparent application of the capacity weighted reference price methodology is necessary. However, as the capacity weighted distance reference price methodology according to Article 8 of Regulation (EU) No 2017/460 is not itself subject to consultation and is described in detail in Article 8 of Regulation (EU) No 2017/460, it is sufficient in this case to specify the reference prices calculated according to Article 8 of Regulation (EU) No 2017/460 in spreadsheet C_Entry_Exit on the data entry form. In addition, a detailed and transparent explanation must be given under point 7 of the report that the methodologies and calculations used conform to those stipulated in Article 8 of Regulation (EU) No 2017/460.

This includes in particular the possible formation of clusters, the formation of combinations and a description of the relevant flow scenarios as well as the calculation of the shortest distance of the pipeline routes in accordance with Article 8(1)(b) to (d) of Regulation (EU) No 2017/460.

In contrast with the proposed reference price methodology, in accordance with Article 8 of Regulation (EU) No 2017/460 the capacities at biogas entry points must also be included and reference prices must also be determined at these points.

The capacity weighted distance reference price methodology must be carried out per transmission system operator and additionally jointly per market area for the purposes of consultation and comparability. To this end, the affected transmission system operators must agree on the individual calculation systems referred to in Article 8 of Regulation (EU) No 2017/460 and must explain in the report how they arrived at the agreement. The Bundesnetzagentur reserves the right to validate the plausibility of the values specified in each case.

On the one hand, the network operator is given the opportunity to comment on the comparison of the capacity weighted distance reference price methodology according to Article 8 of Regulation (EU) No 2017/460 with the proposed reference price methodology. In so doing the network operator may make reference to the criteria listed in the template referred to in Article 26(5) of Regulation (EU) No 2017/460 and/or apply the network operator's own deliberations.

On the other hand, the network operator is obliged to apply these deliberations. With regard to the reasoning behind this obligation, reference is made to point 6.

Re 8: Indicative information in accordance with Article 30(1)(b)(i), (iv) and (v) of Regulation (EU) No 2017/460

According to Article 26(1)(b) of Regulation (EU) No 2017/460 in conjunction with Article 30(1)(b)(i), (iv) and (v) of Regulation (EU) No 2017/460, consultation shall be carried out on the allowed revenue for the year 2020 (estimated revenue cap, see point 4), the transmission services revenue (see point 4) and the entry-exit split upon application of the proposed reference price methodology. The breakdown according to intra-system and cross-system use shall be carried out by the Ruling Chamber when it performs the cost allocation assessment in accordance with Article 5 of Regulation (EU) No 2017/460. For information purposes, the revenues for intra-system and cross-system network use specified by the network operator completing the form are shown on spreadsheet B_Allokation_EOG_u_KStR. Details of the capacity-commodity split are not necessary because only capacity-based transmission tariffs are used, as referred to in Article 4(3) of Regulation (EU) No 2017/460. The entry-exit split is automatically shown in spreadsheet B_Allokation_EOG_u_KStR.

The information is shown separately for each variant of the reference price methodology. In the case of the query pursuant to the separate application of the proposed reference price

methodology taking into account the provisions set out in Determination BK9-13/607 and pursuant to the joint application of the reference price methodology, the Bundesnetzagentur shall combine the values specified by the network operators for each market area in order to calculate the splits.

Where necessary, the network operator may provide more detailed information on these matters under point 8 of the report.

Re 9: Information on non-transmission tariffs

According to Article 26(1)(c)(ii)(1) to (4) of Regulation (EU) No 2017/460, where non-transmission services (Article 3 second sentence para 15 of Regulation (EU) No 2017/460) to network users are proposed the following information must be provided: the proposed non-transmission services tariff methodology, the share of the allowed revenue forecasted to be recovered from such tariffs, the manner in which the associated non-transmission services revenue is reconciled as referred to in Article 17(3) of Regulation (EU) No 2017/46, and the indicative non-transmission tariffs for non-transmission services provided to network users.

The indicative non-transmission tariffs for meter operation and metering for the non-transmission services provided to network users must be entered in spreadsheet D_Systemdienstleistungen in accordance with the previous queries on tariffication.

The revenues assigned to the non-transmission services of meter operation including metering are automatically entered in spreadsheet B_Allokation_EOG_u_KStR on the data entry form.

Where an alternative nomination procedure in accordance with section 15(3) GasNZV is offered, the total amount of revenue recovered from this procedure must be specified on spreadsheet D_Systemdienstleistungen. This amount is automatically transferred to spreadsheet B_Allokation_EOG_u_KStR.

The biogas and market area conversion costs that are expected to be reported to the network operator for the year 2020 must be specified in spreadsheet A_Allgemeine_Informationen in order to calculate the tariffs for the biogas neutrality charge and market area conversion charge. This will enable the Ruling Chamber to calculate the indicative charges, taking the relevant capacities into account. No comparison of planned and actual values is required in the statement of the indicative non-transmission tariffs.

Any other non-transmission services and the revenues expected to be recovered from them may be specified in spreadsheet B_Allokation_EOG_u_KStR.

For each non-transmission service, under point 9 of the report a detailed and transparent description must be given of the proposed non-transmission services tariff methodology, the share of the allowed revenue forecasted to be recovered from such tariffs, the indicative non-transmission tariffs for the non-transmission services and the recipients of the non-transmission service (abstract term). In addition, the network operator completing the form must demonstrate that the respective tariffs are cost-reflective, non-discriminatory, objective and transparent in accordance with Article 4(4)(a) and (b) of Regulation (EU) No 2017/460 and that they are charged to the beneficiaries of the non-transmission service with the aim of minimising cross-subsidisation between network users within and/or outside the Federal Republic of Germany.

With respect to the manner in which the revenue associated with non-transmission services as referred to in Article 17(3) of Regulation (EU) No 2017/460 is reconciled, the Ruling Chamber intends to have the reconciliation carried out mutatis mutandis in accordance with Articles 17 to 20 of Regulation (EU) No 2017/460. In this context it is proposed that only one regulatory account per transmission system operator shall be kept for transmission services and non-transmission services in accordance with section 5 ARegV.

As no commodity-based transmission tariffs as referred to in Article 4(3) of Regulation (EU) No 2017/460 are proposed, the information according to Article 26(1)(c)(i) of Regulation (EU) No 2017/460 is not applicable.

Re 10: Indicative information according to Article 30(2) of Regulation (EU) No 2017/460

Article 26(1)(d) of Regulation (EU) No 2017/460 stipulates that the indicative information as referred to in Article 30(2) of Regulation (EU) No 2017/460 must be provided.

In this connection the network operator is required to submit, in the form of an annex, the current version of the information that is to be published in accordance with Article 30(2) of Regulation (EU) No 2017/460. Article 31(1) of Regulation (EU) No 2017/460 already requires that the information must be published in a downloadable format.

The Ruling Chamber intends to make the December 2017 publication of the information referred to in Article 30(2) of Regulation (EU) No 2017/460 subject to consultation on the market with regard to its compliance with the requirements set out in Regulation (EU) No 2017/460.

Re 11: Adjustments in accordance with Article 6(4) of Regulation (EU) No 2017/460

Under point 11 the transmission system operator must enter information on the rescaling referred to in Article 6(4)(c) of Regulation (EU) No 2017/460 at all entry and exit points with the aim of actually being able to recover the transmission services revenue. However, such information may be restricted to general remarks on the rescaling methodology.

Applications for other equalisations and adjustments may be made under point 11 and must include detailed grounds in line with the requirements of Regulation (EU) No 2017/460. The same applies to any benchmarking in accordance with Article 6(4)(a) of Regulation (EU) No 2017/460.

Re 12: Other explanations

This item in the report provides space for other aspects which, in the network operator's view, are relevant for the cost allocation assessment referred to in Article 5 of Regulation (EU) No 2017/460 and for the final consultation referred to in Article 26 of Regulation (EU) No 2017/460.