**From:** Lorenzo Maina [lorenzo.maina@adriaplin.si]  
**Sent:** Monday, March 26, 2012 1:01 PM  
**To:** FG-2012-G-007  
**Subject:** Comments on PC-07-Draft Framework Guidelines on Interoperability and Data Exchange Rules for European Gas Transmission Networks

Dear Sirs,

We address you a few comments.

Being a small company active in Slovenija on gas distribution and sales, please accept our contribution in this reduced form.

**3. Harmonisation of Units**

*3.1. Do you think that there is a need for harmonisation of units?*

a. Yes.

*3.2. What is the value added of harmonising units for energy, pressure,  volume and gross*

*calorific value?*

c. Both easier technical communication among TSOs and easier commercial communication between TSOs and network users.

f. Other views. Easier commercial communication between supplier and Final Client. Mwh is spreading more and more as a well understood unit for energy / gas in this relation. Moreover, it has »natural appeal« for the comparison with electricity.

**5. Odorisation**

*If bilateral agreements fail to address effectively issues relating to differences in odorisation*

*practices, the Network Code shall ensure that odorisation takes place so as not to hamper*

*cross-border trade by allowing physical cross-border flows of non-odorised gas, as a default*

*rule. The Network Code shall foresee an interim period of 36 months for the implementation of*

*the measure.*

It is not clear to us which is the purpose of the highlighted sentence.

Does the Agency think about a sort of a »buffer« of non-odorised gas, aimed at segregating  an area where a type of odorizer is used from another area where another type of odorizer is used?

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We hope our comments can help.

Best regards.

