



Energy Agency of the Republic of Slovenia
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• **Do you agree with the high-level conclusions of this report?**

Yes we agree with the conclusions of the report.

• **As a manufacturer do you maintain an inventory of installed appliances?**

We are state regulator and we do not keep the records about the installed appliances..

• **Are there any specific gas quality related issues not recognised within this report?**

The biogas is intentionally excluded in the report, but some guidelines have to be proposed – e.g. harmonised gas quality tolerances and biogas quality deviation – where and how to meet. The biogas quantity is expecting to rise in the following years and will surely have respectful market share. On the other hand, we are dealing only with TSO – but in the report are quoted domestic appliances who are surely not connected to the TSO.

• **Do you manufacturer appliances that can operate over the full EASEE-gas specification without loss of efficiency or increased of emissions?**

As the state regulator we do not have records about the loss the efficiency or increase emissions. There are universal guidelines by the appliance producer (e.g. Slovenian appliance manufacture Gorenje – www.gorenje.si);

• **Do you have evidence of damage or failures caused by appliance operating on gas that is not compliant with the local gas quality specification?**

We are state regulator and we do not keep the records about it. We suggest to contact to contact European Committee of Domestic Equipment Manufacturers – CECED (www.ceced.eu), which keep the records about it or could answer more in detail.

- **Would you support the adoption of the proposed EUROMOT gas quality specification, (Appendix B) ?**

The EUROMOT gas quality specification still needs some improvement in terms of technical and legislation rules, which would be binding for the gas market participants. Upon those propositions, also regulator has the power to implement the rules and conduct market monitoring.

- **Are there any specific circumstances that should be assessed in detail?**

There should be quoted or described the mixing rules, what are the agreed tolerances as well as penalties for those which do not comply with the agreement.

- **Do you consider that the data used to undertake this analysis is sufficient to support the conclusions presented in this report?**

No. If You cover Slovenia, then the data in the report should cover also Slovenia – like Figure F.5, Figure G1, ...

The comparison is then possible and give also reference values for other neighbouring countries (Austria, Italy, Croatia, Hungary) and also make harmonisation issues/demands among neighbouring countries more valid and transparent. Like Eurostat EU 27 countries energy profile.

In the executive summary should be clearly given statement what is understood as Europe – whole geographical area as Europe, certain countries in Europe or »only« EU 27 countries.

- **Should significant effort be made to improve the data used in the analysis presented in this report?**

The data should be compared on all country's interconnection points and data could be tracked or monitored by the TSO. Reporting could be included in the annual TSO's reporting to the state regulator who is besides TSO very interested for the valid data.

- **Do you have access to further data that could (if it were made available) improve the quality of the data used in the analysis presented in this report?**

Some of the data, which are needed in the report are already available in our annual reports (e.g. see Figure G1, Appendix D), which could be found on the Agency's homepage – [link](#).

- **Can you provide typical detailed gas composition at cross border points?**

The criteria about the gas composition, which should be met are stated in the System operation instructions for the transmission of natural gas, the Official Gazette of the Republic of Slovenia, No. [89/05](#); - see also Your table (Table 3.4). The daily or monthly variations of the natural gas composition – quality and control are available by only Slovenian TSO www.geoplin-plinovodi.si

- **If so, can this data be made available (respecting confidentiality, as required)?**

About the data availability is the concern of the TSO and therefore Slovenian TSO should be addressed for further information inquiry.

- **How should data be collected for such a study?**

The data should be collected as the best practice rule by ERGEG/CEER way or similar (EU) institution with the online questionnaire for the interested parties.