**Austrian Gas Market Changes 1st October 2022 and effect on EFET Austrian VTP Appendix**

* Traders no longer need their Balance Responsible Party to be a member of the Exchange to balance. Imbalances will be settled directly with the Single Clearing Entity (Bilanzierungsstelle) although balancing actions in the market will be carried out on its behalf by the MADAM (Market Area and Distribution Area Manager/ Markt- und Verteilergebietsmanager)
* Austrian VTP continues only to be for eastern Austrian region, Voralberg and Tyrol regions continue to be balanced at the THE in Germany.
* ***Remedies*** Daily Imbalance Charges for daily balancing gas bought and sold on behalf of the SCE: Shorts ("Market Buy Price") = Higher of (i) highest purchase price paid by MADAM for balancing energy during Day and (ii) weighted average Exchange price plus 3%.

Longs ("Market Sell Price") - Lower of (i) lowest sale price received by MADAM for balancing energy during Day and (ii) weighted average Exchange price minus 3%.

**Market is in theory a Daily one but trades in hours so need to provide for Daily Imbalance Charges to apply for hourly imbalances in Appendix**

* ***Remedies*** Within Day Obligation Fees – **NEW and replaces Balancing Incentive Mark up.**  Only payable for hours in a Day when MADAM has taken balancing action in the opposite direction to the imbalance. Balancing Groups have a tolerance of 4% of daily physical exit deliveries**.** Hourly imbalances outside tolerance are cumulated and paid for at the WDO Fee which is the difference between the weighted average price for positive balancing energy and negative balancing energy during the day. **Need to provide for a standard zero tolerance to avoid enquiring into portfolios in Appendix and make it clear these only payable on Days when MADAM takes balancing action.**
* ***FM*** Balancing Group Curtailment - **NEW.** MADAM will have an additional right to curtail Balance Groups by changing the nominations (both entry/exit and at the VTP) of Balance Groups that are jeopardising the network balance and it can choose which ones to curtail, likely those with largest imbalance quantities, so not done pro rata. **Current Appendix FM clause covers CEGH curtailing nominations but not MADAM so need to expand.**
* ***Warranty as to BG membership TBC-***  We think option to trade VTP without being in a balance group so that any imbalance charges are smeared across you counterparties remains and therefore we need to retain the warranty that traders are in a BG.
* ***Has the obligation to Schedule within the same hour for within day trades gone?***