



## **Compliance Officer**

### **Annual Report**

### **Audit Year 2021**

On the adoption of the measures aimed at the implementation of the Compliance Program in the company GAS DISTRIBUTION COMPANY THESSALONIKI-THESSALIA S.A. (EDA THESS)



This report is submitted and prepared based on the material provided by EDA THESS, in its capacity as the Operator of the Natural Gas Distribution Network for the areas of the Regional Unit of Thessaloniki and Region of Thessaly, to the Compliance Officer of the Company during the execution of his duties for the year 2021. Specifically, the report covers the period from 01.01.2021 to 31.12.2021.

According to the provisions of Law no. 4001/2011, as amended, the annual report is published on the official website of EDA THESS ([www.edathess.gr](http://www.edathess.gr)) within five (5) days of its submission to RAE, with a deadline for completion thereof on the 31st March of each year.

According to the provisions of Law no. 4001/2011, as amended, the annual report is a key duty of the Compliance Officer, it is submitted to RAE with a deadline for completion on the 31st March of each year and relates to the previous audit year.

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## Acronyms

EDA THESS	Gas Distribution Company Thessaloniki – Thessalia SA or the Company
DEPA	Public Gas Corporation
V.I.C.	Vertically Integrated Company
DNOC	Distribution Network Operation Code
RAE	Regulatory Authority for Energy
RAB	Regulated Asset Base
CP	Compliance Program
EC	End Customer
CO	Compliance Officer



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## CHAPTER A

### GENERAL INFORMATION

#### 1. Introduction

Pursuant to the provisions of the European Directive 2009/73/EC "concerning common rules for the internal market in natural gas and repealing Directive 2003/55/EC" (L 211/2009) and the provisions of Law No. 4001/2011, as in force, "On the operation of Electricity and Natural Gas Energy Markets for Exploration, Production and Transmission Networks of Hydrocarbons and other regulations" and in particular the provisions of case d' of paragraph 5 Article 80, it is provided that "The holder of the Distribution Network Operation License shall draw up and implement a compliance program, in which it shall indicate the measures taken in order to exclude any discriminatory behavior in favor of the Vertically Integrated Company and to ensure the proper monitoring of adherence to the program. The compliance program shall set out the specific obligations of employees to achieve that objective. This program shall be subject to the approval of RAE, which shall be deemed to have been granted if RAE does not object within three (3) weeks of the submission of the program for approval. The approved compliance program shall be posted on the website of the holder of the Distribution Network Operation License within five (5) days of its approval. Without prejudice to the competences of RAE, as specified in Article 20 hereof, compliance with the program shall be subject to the independent audit of the officer or body of the Distribution Network Operation License holder, in charge of monitoring the compliance program, who shall act as compliance officer and shall have access to any information of the operator and any of its subsidiaries necessary for the fulfilment of his/her/its duties. The compliance officer shall submit in writing to RAE, by 31 March of each year, an annual report describing the measures taken to adhere to the compliance program, which shall be published on the RAE website within five (5) days of its submission. The Distribution Network Operator shall comply with the recommendations of RAE and submit for approval, in accordance with the provisions of this paragraph, a new compliance program within fifteen (15) working days of the notification of the RAE Decision. RAE shall publish on its website a report on the assessment of the Distribution Network Operator's compliance program by 30 April of each year."

In fulfilment of the above legislative obligation, the Board of Directors of EDA THESS, with its decision no. 24/ 17.01.2019, nominated Mr. Theodoros Panagos, Attorney at Law, as the Compliance Officer (CO) of the Company. RAE by its decision No. 833/04.09.2019 approved the appointment of the above as the Compliance Officer of EDA THESS and since then he has been exercising his relevant duties.

For the preparation of this report, the statutory responsibilities of the CO with regard to the CP have been taken into account, as the CP has been prepared by EDA THESS within the framework of its obligations as Distribution Network Operator and submitted to RAE.



## 2. Purpose of the Program - Basic Principles - Compliance Criteria

In accordance with the provisions of § 5 of article 80 of Law No. 4001/2011, as in force, EDA THESS, which by law has become the Gas Distribution Network Operator in the Regional Unit of Thessaloniki and the Region of Thessaly, should develop and implement a CP. In the reference year 2021, EDA THESS was part of the Vertically Integrated Natural Gas Companies (VICs) of DEPA Infrastructure SA and Eni Gas e Luce Spa, with a shareholding of 51% and 49%, respectively.

In accordance with the above provisions of the applicable legislation, EDA THESS shall draw up and implement the CP, which includes measures to eliminate any possibility of discriminatory behavior in favor of any branch or part of the V.I.C. and its Affiliates and to ensure proper monitoring of compliance with the CP.

The measures included in the CP emphasize the observance of the above principle in the context of the relationship of EDA THESS with any branch or part of the V.I.C. or its Affiliates, as this relationship involves a regulatory risk due to the creation of EDA THESS from the merger of the distribution branches of the former EPA Thessaloniki S.A. and EPA Thessaly S.A., which, in the course of their activities at that time, were also engaged in the supply activity, as well as from the relevant functional interdependencies that may still exist.

The CP is based on the basic principles that the Top Management, the Management and all the personnel of EDA THESS are obliged to implement, regarding the independence of the Company, the non-discriminatory behavior towards the Users of the Natural Gas Distribution Network and the End Customers, the safeguarding of confidentiality of the information managed by EDA THESS and the transparency in all the activities of the Company.

The purpose of the Compliance Program is to ensure that EDA THESS:

- i. has no discriminatory behavior in favor of the V.I.C. or any branch or part thereof, as well as its Affiliated Companies
- ii. does not discriminate against End Customers
- iii. does not discriminate against Distribution Users
- iv. does not distort the development of competition

For this purpose, the CP includes measures and procedures to be applied by EDA THESS with emphasis on:

- Distinct corporate identity between EDA THESS and other branches or divisions of the V.I.C. or its Affiliates.
- Equal treatment of all End Customers and Gas Distribution Users
- Safeguarding access to commercially sensitive information
- Equal access to information concerning the activities of Distribution Users
- Information and training of staff on the CP and its implementation measures
- Reference to sanctions that may be imposed in the event of a breach of the CP.

## 3. Audit methodology

The CP describes the audit points of the Company's basic operating principles, in accordance with the prescribed methodology, which consists of:



- Random audits, during which individual samples of cases are taken, where possible, based on any existing complaints, notifications, grievances mainly to RAE, the importance of each audit point for the operation of the company, the difficulty of implementation, etc,
- thorough controls, in all cases relating to each audit point,
- meetings, training workshops and additional interviews with relevant staff, particularly where deviations from the requirements of the CP that require further clarification, are identified.

The structure and the content of the CP that the Company prepared and submitted to RAE with its letter no. 2964/22.02.2019 and that has been approved by RAE, was followed in the preparation of this Report.

The random checks were carried out at the offices of the inspected and included the following phases: a) kick-off meeting, b) on-site inspection, c) interview, d) sampling, e) documentation, f) final meeting and completion of the inspection. In particular, during the audited period and due to the measures taken to limit the transmission of COVID 19, targeted teleconferences took place, including the participation of the CO in the Company's BoD meetings.

## CHAPTER B

### NATURAL GAS DISTRIBUTION NETWORK OPERATOR ACTIVITIES

#### A. General Activities

##### 1. Independence

For the smooth and orderly operation of the retail gas market in the geographic areas where EDA THESS operates, it is imperative that the Company is independent in its decision-making from the V.I.C. or any of its affiliates, while the execution of its tasks must be governed by impartiality and transparency, seeking to adhere to strict principles for the protection of free competition. These conditions are an important regulatory requirement for EDA THESS and their pursuit is a primary concern of the Company. In order to fulfill the above, each organizational unit of the Company is required to ensure the four basic operating principles.

##### a) Distinct corporate identity

The activity to ensure the distinct corporate identity is broken down into two sub-activities:

- Creation and implementation of a distinct corporate identity
- Promoting communication measures for services and visibility

##### aa) Creation and implementation of a distinct corporate identity

In accordance with the provisions of Law no. 4001/2011, EDA THESS must have taken the necessary decisions/measures to promote the distinct corporate identity and monitor the





progress of promotion in all media, with the ultimate goal of clarity and avoiding confusion of its corporate identity with that of any other branch or division of the V.I.C.. The above obligation is assigned in order to avoid any confusion among End Customers regarding the relationship between EDA THESS and any other branch or division of the V.I.C., in accordance with the provisions of Article 80 of Law No. 4001/2011, as applicable, based on the key principle of independence.

In this context, the Company has already undertaken actions that contribute to the distinct corporate identity of EDA THESS (logo specifications, branding, etc.) and its implementation. In particular, it has created - from the first day of its operation - a distinct name, distinct corporate identity features of EDA THESS and a distinct corporate logo.

During the audit that took place, it was established that the consistency and correctness of the use of the corporate image of EDA THESS was maintained in printed forms, in particular internal documents (forms, etc.), corporate cards and communication documents with third parties (letterheads, etc.), premises, movable and immovable assets of EDA THESS (such as vehicles, signs, workclothes of partners, etc.), electronic correspondence and the website of EDA THESS.

#### **(bb) Promoting communication measures for services and visibility**

EDA THESS must clearly communicate to the Users and existing and potential End Customers of the Gas Distribution Network, the separation of its corporate identity and the scope of its services and tasks, from the activities of any branch or division of the V.I.C. It must also communicate to the Users of the Distribution Network its obligation to provide all services in accordance with the legislation and the DNOC, impartially and without discrimination.

The incomplete communication promotion for the visibility of EDA THESS would result in the lack of transparency required by the provisions of Law no. 4001/2011 for preventing confusion among End Customers about the segregated environment.

In the context of strengthening the corporate image of the Company and the visibility of EDA THESS, the Company regularly implements communication actions in order to inform the consumer public about the initiatives concerning safety issues and the development of the distribution network in existing and new areas of the License, sponsorship actions and corporate social responsibility actions carried out in cooperation with local bodies.

The communication actions carried out include the publication of press releases, the posting of information material in printed and electronic media, the promotion of corporate material in the media, and the Company's social media postings. The aim is to increase the visibility of EDA THESS by having a continuous presence in the media and social media. In addition, the corporate website is the main tool for informing the Company's consumers. The content of the website is constantly updated with information based on the obligations arising from the regulatory and statutory framework, as well as actions aimed at strengthening the distinct identity of EDA THESS.



During the sampling exercise carried out, it was established that EDA THESS is recognisable as an independent company, distinct from the V.I.C or their branches. The recognition was additionally confirmed by the brand awareness survey completed in November 2021 and by the audit of the promotional activities implemented to inform consumers and the Company's partners on issues related to Operational Independence, following the unbundling of the gas distribution and supply sectors completed at the end of 2016. The campaign to raise awareness on Operational Independence for the year 2021 was carried out throughout December by sending materials (banner & press release) to media, sending emails to new consumers and distributing printed material at the Customer Service Offices.

#### **b) Briefing staff and third-party partners on regulatory requirements and the Compliance Program**

The information and training of EDA THESS staff and third party partners affects all the basic criteria as set by law. The relevant obligation is provided for in § 1.2 of the CP. In particular, the training obligation is essential, since the lack of training affects the equal treatment of Distribution Users and End Customers, transparency, impartiality, objectivity and independence of the Operator. Furthermore, the lack of information and training of the Company's personnel may lead to non-compliance of the Company with the relevant legislative and regulatory framework and may have direct consequences on the key principles stipulated by Law No. 4001/2011.

The Unit of Corporate Affairs & Internal Audit with the support of the Unit of Human Resources, implement actions for the continuous updating of the Company's personnel regarding the requirements of the regulatory framework, the importance of compliance by the personnel, as well as compliance with the obligations arising from the CP after its approval by RAE. At the same time, the Unit of Corporate Affairs & Internal Audit and the Unit of Human Resources ensure, in cooperation with the CO, that a training program is developed and executed for the Company's staff and third-party partners. The training program is appropriately calibrated to meet the needs according to the position and responsibilities of each Company employee and their interaction with Distribution Users, End Customers and commercially sensitive information.

During 2021, the Company increased the awareness of its staff regarding the Code of Ethics and the rules governing its operation, by informing the staff and focusing primarily on the adoption of preventive measures and mechanisms to enhance transparency and independence in all its activities, as well as by intensifying its control mechanisms. In addition, the recruitment process for new staff includes the information and declaration of receipt and acceptance of the Code of Ethics. To date, the Company has regularly conducted training seminars and staff awareness communications on operational independence to employees in 2017, 2018 and 2019. In all cases, staff are informed of the Company's zero tolerance for any incident that constitutes a deviation from the framework of operational independence.



When reviewing the staff briefing report as provided to the CO, the CO found that the objective of raising staff awareness on operational independence issues was achieved.

### **c) Ensuring the independence of the members of the Board of Directors**

In accordance with the provisions of paragraph 5, article 80 of Law No. 4001/2011, the persons exercising the management of the Company that holds a Distribution License and/or Distribution Network Operation License shall not be allowed to participate, in the management, in branches or departments of the Gas or Electricity V.I.C. or another Associated Company of the Gas or Electricity V.I.C. that are responsible, directly or indirectly, for the operation of the Production, Transmission and Supply of Natural Gas. The aforementioned persons shall not have any vested interests which may hinder the exercise of their functions in an independent and objective manner. In this context, the composition of the Board of Directors of EDA THESS ensures its independence, in accordance with the requirements of Article 80 of Law No. 4001/2011, as in force. Where applicable, EDA THESS shall keep appropriate documentation of the compliance of the members of the Board of Directors with the aforementioned restrictions.

In this respect, the audit carried out showed that the natural persons who form the administration and management of the Company continue to meet the above requirements.

### **d) Ensuring the independence of other persons authorized to make management decisions**

The Unit of Corporate Affairs & Internal Audit and the Unit of Human Resources shall ensure that the Company's executives are independent of other branches or divisions or other Affiliates of the Gas V.I.C. and do not have vested interests that interfere with the performance of their duties in an independent and objective manner. In particular, this category includes Managers. EDA THESS must ensure that the executives occupying the above positions, i.e. belonging to the management team, meet the requirements of Article 80 of Law No. 4001/2011. Where applicable, EDA THESS shall keep appropriate documentation of their compliance with the restrictions imposed by the above legal framework.

The audit revealed that all the Company's executives continue to meet the above requirements and have submitted the relevant solemn declarations.

After conducting an audit of this point, it was found that there are no deficiencies in the relevant supporting documents (i. CV, ii. Documents certifying their qualifications and professional experience and iii. Solemn declaration of article 8 of law 1599/86 and in particular the provisions of article 63D of Law 4001/2011), with the majority of these having been collected by the competent staff of the Operator (completeness of 100%).

## **2. Corporate website management**

The website of EDA THESS is a means of providing information on the services provided by the Company, as well as for the service of End Customers and Distribution Users without discrimination.



In compliance with the principle of transparency and equal treatment of all Distribution Users and End Customers of the Network, EDA THESS maintains and updates the corporate website, which is a basic means of communication and general information for End Customers and Distribution Users, regarding the services of the Operator, as defined in Law No. 4001/2011 and the DNOC.

After a check on the completeness of the website, it was found that all the information material required by the regulatory framework is posted and updated.

### **3. Information Systems**

#### **3.1. Information Systems Security**

EDA THESS ensures the security of its information systems in order to safeguard the confidentiality, integrity and availability of the information managed, in accordance with the best available technology and international practices. Specialized devices protect the Company's information systems and the intranet from cyber threats.

Following the audit, it was found that: a) the Company has undertaken a digital transformation of its activities in order to avoid personal contact between interested third parties (e.g. installers) and the Company's services and b) the competent organizational unit applies sophisticated methods to identify and address vulnerabilities of information systems in order to ensure their effective protection and security. In order to better monitor the above, the Operator has a specialized software platform for the continuous monitoring and evaluation of the security of its information systems and has appointed an Information System Security Officer. The Information and Network Security Officer is responsible for the obligations arising from Law no. 4577/2018 (A 199) and the Ministerial Decision 1027/08.10.2019, regarding the Security of Network and Information Systems.

A reminder was given to continuously upgrade information systems, in alignment with modern technologies.

#### **3.2 Management of commercially sensitive information in the Information Systems of EDA THESS**

EDA THESS is obliged to protect the commercially sensitive information of End Customers and Distribution Users, as recorded in its information systems. This obligation arises from the provisions of Article 80 of Law No. 4001/2011, where it is stated that EDA THESS has the obligation to preserve the confidentiality of commercially sensitive information, as well as the obligation to provide equal access to information that concerns the activity of the above persons and may provide commercial advantages to third parties. Commercially sensitive information includes, but is not limited to, the following information/data, other than that already published:

- End Customer Register of each User/Supplier
- End Customer Meter Readings
- Connection and usage applications and contracts



- Data on the initial and/or final allocation of Natural Gas quantities, and on the tariffs of the Basic Activity & Ancillary and/or Optional Services
- Tenders submitted in tendering procedures for the award of works, services or supplies by EDA THESS and contracts concluded with contractors
- Accounting or budgetary data on the cost of works, procurements and services of the EDA THESS.

The purpose of this obligation is to ensure equal treatment, transparency in the exercise of the activity and confidentiality. The leakage of commercially sensitive information from one User/Supplier to another User/Supplier may give an unfair competitive advantage, distorting competition.

In order to ensure the confidentiality of commercially sensitive information in the information systems, EDA THESS maintains an Information Security Management System and in this context applies an Information Security Policy issued under the responsibility of the Information and Network Security Officer. The Policy defines the organizational measures for supporting and managing Information Security across the Company's individual operations. To this end, it defines the individual tasks and responsibilities of the personnel involved, as well as the separation of these responsibilities, in order to avoid cases of conflict of interest in their exercise. In addition, the Policy defines the necessary measures to establish the Company's communication with Authorities and special interest groups, when necessary, as well as the integration of Information Security in the Company's project management. The tool for ensuring confidentiality is the Electronic Information Exchange System.

As part of the relevant audit through sampling, it was verified that the security safeguards of the Information Systems as described in the Information Systems Security Policy and the security procedures are fully observed.

The ability of the company's information system to withstand, with a given degree of reliability, actions affecting the availability, authenticity, integrity or confidentiality of the data stored, transmitted or processed through this information system, in order to ensure the correct and secure execution of its activities, was verified. At the same time, with the widespread use of information systems, measures are taken to address risks that may compromise the security of information resources and, by extension, the information contained therein, in an effort to safeguard the key principles of confidentiality, integrity and availability.

In the above context, a set of automated safeguards and control mechanisms have been implemented to protect the security of information and data, taking the corresponding organizational and technical measures, using modern security technologies, in accordance with best practices and security standards, in order to provide a high level of security and protection of information.

In relation to the above, the Company submitted by letter no. 1283/27.01.2022 to RAE the Annual Report on the evaluation of the effectiveness of the procedures for the



safeguarding of confidentiality and protection of commercially sensitive information for the year 2021. The Company has implemented a set of control measures and mechanisms to protect the security of information and data, taking the relevant organizational and technical measures, using widely modern security technologies in accordance with best practices and security standards, in order to provide a high level of security and protection of information.

The Company has developed and is in the process of fully implementing a specific governance framework "Information Security Management System", based on the requirements of the international security standard ISO 27001:2013, which consists of a set of Policies, Procedures, Technical Security Standards and Technical Guidelines. The Information Security Management System covers all data, information and information systems, such as software, hardware, forms, information storage and transfer media, as well as computer networks. It applies to every user (employees, system administrators, users, auditors, consultants, external partners) who has access to the organization's information assets.

#### **4. Management of Network Development and Maintenance Programs**

In accordance with the provisions of Article 80 of Law No. 4001/2011, EDA THESS as Distribution Network Operator is obliged to implement the Distribution Network with the resources of the Distribution License holder, in accordance with the five-year Development Program, which is prepared by the Operator, submitted to RAE for approval and renewed annually.

EDA THESS shall prepare and submit to RAE for approval the Development Program no later than 1 November of each year, in accordance with the provisions of the DNOC. The approved Development Program shall be published on the website of EDA THESS.

Also, based on the provisions of DNOC, EDA THESS is required to prepare the Distribution Network Maintenance Program and its updates on an annual basis and post them on its website.

The purpose of the above is to ensure transparency in the exercise of the activity and equal treatment. The preparation of the Programs is a legal obligation of EDA THESS and affects the transparency of the Company with regard to its obligations and the equal treatment of Distribution Users.

The audit confirmed that the annual Development Program for the year 2022 was prepared within the above-mentioned timeframe, which was approved by RAE. The multi-year development program for the years 2022-2026 will be submitted by 31.3.2022 as per the application of the Company approved by RAE. The RAE-approved Development Program for the years 2021-25 is posted on the Company's website (RAE 1582/10.12.2020, OGG B' 5999/31.12.2020).

The Maintenance Program has been prepared according to the set schedule and posted on the corporate website for the year 2021. Compliance with the regulatory framework and the



provisions of DNOC in relation to the scope of competence of the relevant Unit is confirmed through monthly audits carried out by the Unit, the results of which are presented in monthly reports to the General Management.

## 5. Complaints management

EDA THESS is the recipient of complaints from citizens, Consumers/potential Customers, existing End Customers, Distribution Network Users, as well as from Institutions and Authorities in the following ways:

- by written request to the Company, which can be submitted by form, letter, e-mail, fax, company website, as well as the Electronic Information Exchange System (only for Distribution Users)
- a verbal request to the Company via the call center and the Customer Service Offices

Complaints management and, in particular, the regulatory response time are provided for in the provisions of DNOC, as amended. Complaints management shall be based on the principle of equal treatment of Customers and Distribution Users and shall reflect transparency and objectivity in the activities of EDA THESS. The purpose of the above is equal treatment, transparency in the conduct of the activity and objectivity.

In order to ensure proper management and, accordingly, compliance with the key principles of independence, there should be an appropriate organization and procedure for the handling of complaints by EDA THESS.

In order to ensure the transparency of the Operator, End Customers (existing and potential), Distribution Network Users, Entities/Authorities should be fully and clearly informed about the timeframes, as defined in the respective DNOC, within which the Company is obliged to respond.

The Unit of Market Development is expected to draw up a complaints management procedure to ensure the fair and non-discriminatory handling of complaints, which defines the roles, response times and follow-up actions. This procedure shall be communicated to the relevant Company personnel.

The Unit of Market Development also processes the recorded data of complaints periodically and produces a report. Finally, the Company's website provides a relevant complaint e-mail address or an online complaint form. The information systems used to manage complaints are the CRM Customer Relationship Management System, Electronic Information Exchange System and the Company's Website.

The audit found that the Complaints Management Procedure was issued in 2017 and is reviewed regularly. The procedure is accessible via the Company's public website to all staff and with each update of the procedure, relevant staff and the Company's management are informed via email. The sample audit verified that complaints were handled in a timely manner and in accordance with the DNOC. The performance reports provided showed that



the management of complaints is completed within the regulatory timeframes as required by DNOC at 98.5% (68/67 complaints were responded to within the regulatory time).

## 6. Protection of Personal Data

EDA THESS is committed to protecting personal data and is fully complying with the General Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("GDPR Regulation"), Law no. 4624/2019 and the other relevant legislative framework. For this reason, the Company, by implementing appropriate organizational and technical measures, has adopted relevant policies and procedures and regularly conducts training seminars for its staff, in order to meet both the legislative requirements and the requests of the data subjects. It upgrades its systems and continuously reviews and updates its Management System documents. The company has also appointed a DPO, who in collaboration with the Unit of Corporate Affairs & Internal Audit and the Company's involved Units, manages all matters relating to personal data.

## 2. ACTIVITIES FOR END CUSTOMERS

### 2.1 Managing new End Customer connections

The procedure followed by EDA THESS for the connection of new End Customers to the Gas Distribution Network includes the following steps:

- Receipt of a request for a new connection.
- Informing the End Customer of his/her rights regarding his/her request and the obligations of EDA THESS towards him/her.
- Within a predetermined number of working days from the submission of the request, as defined in the Distribution Network Operation Code, EDA THESS shall submit a connection quote or a rejection letter.
- After the completion of the End Customer's obligations, the Connection Contract is signed.
- After the completion of the construction of the new Delivery Point, and the confirmation of the existence of a Usage Contract, the activation of the End Customer is implemented and the End Customer is included in the User's Customer Register, upon receipt of all other documents required, as the case may be.

In order to ensure the Company's transparency, a potential Distribution Network End Customer should have equal, uninterrupted and full access to the information relevant to the request, in order to be properly and fully informed about:

- the required forms, documents and supporting documents,
- connection fees,





- the timeframes within which EDA THESS commits to complete the connection request, as set out in the DNOC,
- the stage of implementation at which the request is at any given time.

At the same time, in order to respect the equal treatment of all potential Network End Customers, the following should be provided without discrimination:

- service from all customer service offices and the call center,
- implementation of the request in the same way as the same requests from other End Customers.

At the same time, the commercially sensitive information of potential End Customers must be safeguarded. To ensure equal treatment, the Company has prepared a guideline/procedure for receiving requests/contracts for new connections, which is sent to the relevant Sectors and communicated to the Compliance Officer. The same Unit shall also ensure that all its employees are informed and aware of their obligations in this regard. This guideline/procedure is intended to ensure:

- that the requests will be dealt with in accordance with the provisions of the DNOC, as in applicable,
- that requests for new connection will only be forwarded after the applicant has submitted all the required documents,
- compliance with the methodology for calculating connection fees,
- informing the End Customer, through the documents/forms made available to him/her, as to the possibility to have access to all relevant information for the implementation of the request.

Subsequently, the Company shall ensure the preparation and distribution, in all the customer service offices of EDA THESS, of information leaflets regarding the connection application procedure, the connection fees and the timeframes for the implementation of new connections to the End Customers.

The Company, in the context of ensuring transparency, ensures that the relevant information is posted on the website of EDA THESS, in accordance with the information sent by the Unit of Market Development as specified in activity 1.5.

The safeguarding of commercially sensitive information is carried out through the appropriate registration in the information systems of EDA THESS and on the basis of the foregoing in Activity 1.6 of the CP.

The sample audit verified that new connections were managed in a timely manner and in accordance with the DNOC. Specifically, performance reports requested and provided and through access granted, showed that the response to new connection requests is completed within the timeframe set in the Network Operation Code. The average response time is 13.62 working days, which is within the regulatory time set at 21 working days. Details of the



procedure, connection fees, etc. and the connection request template are accessible through the corporate website.

## 2.2 Management of the conclusion and updating of Connection Contracts

According to the DNOC, in order to connect a new Delivery Point to the Distribution Network, a Connection Contract is concluded between EDA THESS and the owner of the installation or its legal or authorized representative. The counterparty shall pay the Connection Fees and the Expansion Fees, if any. The Connection Contract shall be drawn up in writing, in accordance with the Model Connection Contract, which shall be posted on the Operator's website.

The conclusion and updating of a Connection Contract directly affects both equal treatment and the need for transparency in the observance of contractual terms and application of the Connection Fees to End Customers, while it also raises confidentiality issues, as the Connection Contract contains a wealth of commercially sensitive information.

The competent Unit of Market Development proceeds to the conclusion of a model Connection Contract, which defines the obligations, the rights of the contracting parties and the contractual terms, is approved by RAE, is posted on the website of EDA THESS and is accessible to all contracting parties, thus ensuring the equal treatment of all End Customers. The model Connection Contract used in 2021 has been approved by RAE on 11.05.2020 (RAE decision 756/2020, OGG 1788/11.05.2020).

The Unit of Corporate Affairs & Internal Audit ensures the posting of the model Connection Contract on the corporate website upon request by the relevant Unit as specified in activity 1.5 of the CP. The Model Connection Contract is posted on the Company's website.

In order to ensure transparency, the Unit of Market Development has established a common methodology for the calculation of Connection and Extension Fees (if any) for potential Customers, which shall also be approved by RAE. At the same time, the confidentiality of information is ensured by entrusting the management of the Connection Contracts exclusively to competent employees.

During the sample audit carried out, it is documented that the method of calculation of the Connection Fees and Extension Fees, where required to be paid by End Customers, is followed and that the Connection Contract is concluded with the same contractual terms.

The approved model Connection Contract can be accessed via the corporate website.

## 2.3 Management of existing Customer requests

Existing End Customers of the Gas Distribution Network have the possibility to submit a variety of requests concerning their Delivery Point, including but not limited to:

- modification of the capacity of the meter,
- External Installation Modification,
- reconnection or disconnection of meter and/or external installation,



as well as for the other services described in the Ancillary Services, as referred to in the DNOC.

The procedure followed to manage requests from existing End Customers is as follows:

- Receipt of the request, receipt of the required documents/supporting documents depending on the request and check thereof,
- Implementation of the End Customer's request after the fulfilment of the above.

In order to ensure equal treatment of Distribution Network End Customers, the following shall be provided based on non-discriminatory treatment:

- access to information relevant to their requests
- service at all the customer service offices of EDA THESS and the call center
- implementation of their requests in the same way as the same requests of other End Customers

In addition, in order to ensure transparency, the End Customer must have access to the information relevant to his/her request, so that he/she is fully and clearly informed about:

- the necessary forms and other documents required to be submitted to EDA THESS,
- the cost/expenditure, if any, of each request in case it involves construction/repair works etc,
- the timeframes within which EDA THESS must process the request, in accordance with the provisions of the Distribution Network Operation Code. However, no account shall be taken of any delays that are not due to the fault of the Operator,
- the stage of implementation at which his/her request is at any given time and any reasons why the time limits have been exceeded.

Finally, the data and information relating to each End Customer must be protected.

The Unit of Corporate Affairs & Internal Audit, in the context of safeguarding transparency, ensures that the relevant information is posted on the website of EDA THESS, in accordance with the information sent by the Unit of Market Development, as specified in activity 1.5 of the CP.

The Unit of Market Development is responsible for the preparation and distribution to all customer service offices of the brochures for these services and the summary description of the procedure to be followed, as well as the charges for the Ancillary Services.

To ensure equal treatment, the Unit of Market Development proceeds to draft a guideline/procedure/policy for the reception of requests, which is sent to the relevant Sectors and communicated to the Compliance Officer. This guideline/procedure/policy is intended to ensure:

- that requests will only be forwarded after the applicant has submitted all the required documents,



- the respect of the completion timeframes by EDA THESS, excluding any delays due to the fault of the client or third parties,
- informing the End Customer, through the documents/forms available, of the progress and timetable for the completion of the request.

The safeguarding of commercially sensitive information is carried out through the appropriate registration in the information systems of EDA THESS and on the basis of the foregoing in Activity 1.6.

As already mentioned, a procedure for the management of requests has been issued since 2017 and revised in the year 2019. Specifically, the above system includes a procedure for managing any kind of request (Supply suspension, Reconnection, Reactivation, Supply), which is posted on the corporate website and accessed by all company personnel.

From the random audit of requests, no deviation was found in relation to the regulatory times for the processing of these requests. Also, regarding the adherence to regulatory times of the requests, it was confirmed that the regulatory scheduling time of the visit for supply within 8 working days, was adhered to with an average time of 1.28 working days. The average reactivation visit scheduling time is 1.70 working days and within the 2-working-day frame stipulated by the regulatory framework. Finally, the average visit scheduling time for requests concerning supply suspension at the request of a Distribution User is 1.46 working days and within the 14 working days set by the regulatory framework.

#### **2.4 Management of End Customer Meter Readings**

The Distribution Network Metering Regulation defines the meter reading management procedure and the relevant responsibilities, in order to ensure accuracy and transparency towards End Customers. The above Regulation includes the collection and processing of End Customer meter readings. In this context, EDA THESS is obliged, indicatively and not restrictively, to carry out the following:

- Recording the meter reading at the Delivery Point,
- Automatic remote reception of meter reading data, if the appropriate equipment is installed at the Delivery Point,
- Checking the correctness of the meter reading,
- Estimated calculation of the quantity of Natural Gas, when metering was not possible,
- Keeping a record of readings for each meter.

The management of readings affects transparency and equal treatment of End Customers, as there must be unhindered access to information on these issues.

Subsequently, meter readings and other relevant data relating to each End Customer should be protected and their confidentiality should be ensured, as they constitute sensitive commercial data.



The Unit of Corporate Affairs & Internal Audit, in the context of safeguarding transparency, ensures that the relevant information is posted on the website of EDA THESS, in accordance with the information sent by the Unit of Metering & Billing, as specified in activity 1.5 of the CP.

At the same time, in order to ensure transparency and equal treatment of End Customers with regard to the procedures for the correction or estimation of metering, the Unit of Metering & Billing is responsible, in accordance with the Metering Regulation, for the adaptation of the existing metering management system, so that for each meter, the readings, the measurement data - indicated in case of correction or estimation of metering - and the method of correction or estimation are kept for at least five (5) years from their registration, independently of the User representing the End Customer.

The audit carried out by the CO found that the relevant data have been posted on the corporate website and confirmed the keeping of the metering data in the metering management information system since 2013, i.e. for a period of at least 5 years, in accordance with the regulatory obligation.

## 2.5 Management of contractors

In accordance with the provisions of article 80 of Law No. 4001/2011, EDA THESS is responsible for the development, operation and maintenance of the Network within the geographical areas defined in the Distribution License and the Distribution Network Operation License, as well as for ensuring, in the most economic, transparent, direct and impartial manner, the access of Distribution Users and End Customers to the Distribution Network.

Within the framework of its above obligations, EDA THESS ensures the execution of various works in the Distribution Network, including works whose execution is contracted to contractors and which are carried out on new or existing Gas connections of the Network and which may involve interventions on the property of End Customers.

In order to ensure transparency, whenever a crew of a contracting company of EDA THESS visits an End Customer's property to carry out works, they must:

- Make clear to the End Customer that the work entrusted to the contractor by EDA THESS is being carried out on its behalf,
- enable the End Customer to ascertain the name and other details of the contracting company and of EDA THESS, as the contracting entity.

This obligation arises for EDA THESS, as mentioned above, from Article 80 of Law No. 4001/2011, according to which it must be ensured that there is no confusion to the End Customer from the use of trademarks and communication practices, regarding the distinct identity of EDA THESS.

The equal treatment of End Customers is affected, as each End Customer must enjoy the same level of service and transactional behavior, depending on the nature of the work performed, irrespective of the Distribution User representing them.



The details of new End Customers of the Distribution Network, as well as the details of the Distribution Users of existing End Customers, are confidential information and are protected. For this reason, contractors do not have access to the details of the Distribution Users of existing End Customers. The confidentiality of the data of new End Customers, which are disclosed to the contracting companies, is also preserved.

In order to ensure the transparency and distinct identity of EDA THESS, the following measures are taken for the Company's contractors:

- The Unit of Network Construction is responsible for the award of the construction of the new supply and its completion within a predetermined number of calendar days in accordance with the provisions of the Distribution Network Operation Code.
- The Unit of Network Construction and the Unit of Network Operation and Maintenance shall include relevant terms and conditions in all existing works or service contracts for the execution of works.

The use of these terms in contracts ensures that:

- The crews of the contracting companies clearly bear the trademark of EDA THESS, so that it can be easily ascertained by the End Customer that the work assigned to the contracting company by EDA THESS is carried out on its behalf. Specifically, the personnel of the contracting companies during the execution of the works, as defined in the contracts, must wear uniform clothing (work uniform), as well as an identity card prominently displayed, on which both the trademark of EDA THESS, as the contracting entity, and the name, address and contact number of the contracting company that is the contractor of the project are clearly indicated.
- During the visit to the Customer's property, the personnel of the contractor's crews:
  - clearly specify their identity and the purpose of the visit,
  - show the above-mentioned identity card

In order to ensure equal treatment of End Customers, the Units responsible for the above-mentioned measures shall include the following conditions in the contracts with the contractors:

- The personnel of the contractors must perform their duties based on the content of their contractual obligations, the required honesty, good faith and business ethics, regardless of the End Customer and its contractual relations with Users, in order to comply with the schedules for the execution of works as set out in the Distribution Network Operation Code.
- The staff of the contractors shall be polite with the End Customers, shall not make recommendations to the End Customers about specific Users and/or internal installation technicians and shall indicate to them to contact the offices of EDA THESS, verbally or in writing, for any request, question or clarification. It shall report any issues or complaints that



arise to the relevant Unit of EDA THESS. In the event of a dispute, the competent Unit of EDA THESS must be notified immediately by telephone.

At the same time, the staff of the Unit of Network Construction informs the contractors not to disclose to End Customers details of internal installation technicians and Distribution Users.

In order to ensure the confidentiality of End Customers' information, the competent Unit shall include terms and conditions in the respective contracts, by which the contracting companies accept their obligation to preserve the confidentiality of the data they come into possession of, and in particular data (names, addresses, contact details) of End Customers of the Network, during the execution of works at the Delivery Point. At the same time, the Information System, used by the staff of the contractors, as well as the forms exchanged between EDA THESS and contractors, do not contain confidential information, such as details of Distribution Users representing End Customers, etc.

In addition, each contract includes an article on the confidentiality of information.

Following a sample check of the relevant contracts, the existence of the above conditions was confirmed in the projects in progress of EDA THESS. However, small deviations, in a small number of cases, from the planned regulatory time were observed due to the particularity of specific projects for which permits are foreseen which delay the completion of construction within the regulatory timeframes.

The sample check carried out by the Compliance Officer confirmed that the forms exchanged between EDA THESS and contractors do not include Distribution Users' data and that the obligation of contractors to preserve the confidentiality of the data in their possession is respected.

In order to inform Distribution Users (Suppliers) and End Customers, the Company regularly posts announcements on its website, in which it points out that each Customer has the exclusive discretion to choose his/her Supplier and that the staff of contractors are not allowed to make a recommendation of a Supplier, even if they are asked by the Customer.

## **2.6 Management of End Customers with disabilities**

In accordance with the provisions of article 3 of Law no. 4001/2011, EDA THESS, as a company engaged in energy activities, is obliged to implement measures to protect Vulnerable End Customers. The definition of a Customer with Disabilities is referred to in paragraph 34 of Article 2 of the Natural Gas Distribution Network Operation Code.

To ensure that every Vulnerable End Customer is treated equally, he/she must:

- benefit from the management measures provided by EDA THESS, depending on his/her classification, regardless of the User representing him/her
- must have equal service in all the customer service offices of EDA THESS
- Vulnerable Customers with disabilities must be served on a priority basis at all customer service offices



In the context of transparency, each Vulnerable End Customer should enjoy unhindered access to the information concerning the management measures to be provided by EDA THESS to Vulnerable Customers, depending on their classification. This information should be provided by EDA THESS in multiple ways, depending on the specific characteristics of each category of vulnerable customers.

The management of Vulnerable End Customers also affects the confidentiality of commercially sensitive information and their personal data, as the details of each Vulnerable End Customer are recorded in the systems of EDA THESS.

The Unit of Market Development, in order to ensure the equal treatment of Vulnerable Customers, in compliance with the provisions of the legislative framework, issues a Procedure for the management of Vulnerable End Customers to be implemented by the staff of EDA THESS.

The procedure is posted on the Company's website, the relevant personnel are notified of their alignment with the provisions of the Procedure, and the procedure is communicated to the Compliance Officer. The personnel of EDA THESS must be aware of the obligations below:

- The management measures provided by the EDA THESS to Vulnerable End Customers, on a case-by-case basis,
- the timeframes for completion of each management measure by the Unit responsible for implementation,
- the obligation of each Sector of EDA THESS to provide the management measures to each Vulnerable End Customer, depending on the category to which he/she belongs, regardless of the User representing him/her,
- the service to Vulnerable End Customers with disabilities on a priority basis by all staff in the Company's customer service offices,
- the obligation of equal service to Vulnerable End Customers by the Company's customer service office staff,
- the obligation to keep information leaflets and material on management measures for the benefit of Vulnerable End Customers in all the Company's customer service offices.

In order to ensure transparency on management measures, the Unit of Development & New Connections shall ensure that a request is made to the Unit of Corporate Affairs & Internal Audit, to post on the website of EDA THESS information on the management measures to be provided by EDA THESS to Vulnerable End Customers, depending on the category they fall under.

The Unit of Market Development ensures the preparation, publication and distribution to all the customer service offices of EDA THESS, of information brochures on the management measures provided by the Company.





To ensure the confidentiality of the information and personal data of vulnerable customers, the information is registered in the Company's systems and managed in accordance with the provisions of Activity 1.6.

At the same time, the Unit of Market Development keeps the Register of Vulnerable Consumers, which is updated on the basis of the relevant information provided, in order to ensure the support of the management measures provided.

From the audit carried out, it was found that the above have been posted on the Company's website.

## **2.7. Management of excess of guaranteed service limits**

EDA THESS has certain obligations and conditions for the services it offers to End Customers. These services are:

- Preparation of a Connection Quote for the connection of the End Customer's installation to the Network
- Preparation of a Quote to modify part or all of the External Installation of the existing Delivery Point
- Notification of the End Customer regarding the request for the dismantling of the External Installation
- Execution of dismantling works of the External Installation, at the request of the End Customer
- Emergency Intervention Service / On-call Service and Fault and Leakage Notification Service for the notification and response to a Natural Gas leak at the End Customer's Internal Installation
- Response to requests and complaints
- Restoration of supply after suspension due to maintenance, repair or development of the network
- Suspension of Natural Gas supply for maintenance, repair or upgrade of the Distribution Network
- Completion of the External Installation of the End Customer

When the End Customer wishes to be provided with one of the above services, he/she informs EDA THESS through an application to the company, or through the User representing him/her (depending on the service).

If the End Customer fulfills all the prerequisite actions for the services (if any) and is not served by EDA THESS within the timeframes set (through no fault of the End Customer or if there are reasons of force majeure), then the specified financial penalty is automatically paid by the Operator without requiring a request from the End Customer.

The description of the above activity shall enter into force subject to the approval of RAE.

The draft Distribution Network Operation Manual and the form of guaranteed services have been submitted by EDA THESS with the letter no. 11095/31.10.2017 to RAE and the approval of the regulatory obligations by the Authority is expected.



### **3. ACTIVITIES FOR DISTRIBUTION USERS**

#### **3.1. Equal Treatment of Users**

EDA THESS has taken a number of measures to ensure transparency and equal access for Users to all the information it is required to publish, in accordance with the regulatory and statutory framework governing its operation, as provided for in § 3.1 of the Program. In particular, in accordance with the provisions of Article 82 of Law no. 4001/2011, End Customers have the possibility to freely choose the User that represents them. The above eligibility right achieves the Equal Treatment of Users, Transparency and Confidentiality in the exercise of the Distribution activity. In addition to the reference in paragraph 2.5. above, the Company, from time to time, shall make announcements indicating its independence from Affiliated Companies engaged in competing gas activities.

#### **3.2 Distribution Users' Switching Requests**

As mentioned above, in accordance with the provisions of article 82 of Law No. 4001/2011, End Customers have the possibility to freely choose the User who represents them. For this reason, EDA THESS accepts requests from Users for the Switching of the Consumption Meter of End Customers through the Electronic Information Exchange System.

Switching affects equal treatment, as it should be carried out in the same way for all Users, in a non-discriminatory and transparent manner. In particular, Users should have exclusive access to their customer register and to the progress of switching requests.

There is also the issue of confidentiality of commercially sensitive information and personal data, as it should be ensured that each User has access only to the register of its own customers, excluding the case of access to data of End Customers of other Distribution Users.

#### **3.3 Management of Switching requests**

EDA THESS receives requests for Meter Switching of End Customers from Distribution Network Users through the official communication channel of the Company, i.e. through the Electronic Information Exchange System for reasons of transparency. Based on the request number, the User has the possibility to be informed about the progress of his request.

EDA THESS has implemented the Electronic Information Exchange System, through which the relevant requests can also be submitted by the Distribution Users. The Unit of Metering and Billing and the Unit of Information Systems, as the administrator of the Electronic Information Exchange System, grants to the users of the Electronic Information Exchange System, upon their request, usernames and initial passwords for as many users of the Electronic Information Exchange System as each User requires.

In addition, the access of the users of the System is carried out through specific public network addresses (Ip's) to enhance security in access. This ensures equal and secure access to the Electronic Information Exchange System and, in particular, access to the data associated only with the specific User.



The process of switching is carried out with the use of the Electronic Information Exchange System by all Users, thus ensuring transparency for any change that has taken place in the pairing of End Customers - Distribution Users.

Equal treatment is ensured by issuing a guideline/procedure to the relevant Sectors of EDA THESS, outlining the actions, controls and time limits under the relevant Code within which these requests should be completed.

Ensuring the confidentiality of commercially sensitive information is achieved through its management in accordance with the measures set out in Activity 1.6.

The sample check carried out confirmed that the requests of the sample have been submitted through the official means of communication with the Company, have received a request number for reporting purposes from the Distribution Network User and have been serviced according to the priority order that this number assigns to their request. The audit also confirmed that the switching processes that have taken place have occurred through requests registered in the Electronic Information Exchange System, and that the Information System of EDA THESS has also been updated. Finally, it was confirmed that user name codes, as well as access codes to the Electronic Information Exchange System have been assigned to the competent officials of each User, in order to ensure equal access, but also the limited access only to the data of their customers.

#### **3.4 Management of supply suspension requests of Distribution Users**

In accordance with the DNOC, the Network Operator shall suspend the supply to the End Customer, upon his/her request to the Distribution User (voluntary suspension), upon request of the Distribution User in charge of the Delivery Point or upon request of a previous Distribution User, exclusively for reasons of violation by the End Customer of the terms of the contract between them, regarding the satisfaction of his/her financial obligations. Requests for suspension by the Users shall be handled by EDA THESS on an equal basis and transparency in the Company's actions shall be ensured.

In order to ensure transparency and equal treatment, regarding the management of supply suspension due to debt, the submission of requests is made by the Users through the Electronic Information Exchange System, and the CRM of EDA THESS is updated. In addition, information on the progress of the submitted requests is provided to all Users in a uniform manner through the Electronic Information Exchange System.

Furthermore, the equal treatment of Distribution Users is monitored and achieved through a report submitted by 31 March of each year, in accordance with the template disconnection report indicated by the Authority, which includes the 2021 actual data, as referred to in the provisions of the DNOC. The "*Annual Report of the Thessaloniki Distribution Network & Thessaly Distribution Network for the year 2021*" will be notified to the Authority in due time, by 31/03/2022. Also, from a sample check carried out, it has been confirmed that the suspension of supply to End Customers has only occurred upon a request from the User in charge, submitted through the Electronic Information Exchange System.



### 3.5 Management of metering data

In the context of managing the metering data of End Customers, EDA THESS has the following obligations under the Metering Regulation:

- collection of meter readings on the spot or by telemetry,
- sending the readings of each End Customer to the User representing him/her,
- updating the meter reading database,
- solving metering problems such as, but not limited to, not receiving a reading at the scheduled time, incorrect readings, etc,
- sending historical data on the gas consumption of End Customers connected to the Network, upon request of the User representing them or of another User if there is a relevant authorization from the End Customer,
- Provision to each Delivery Point of the consumption characteristic corresponding to the category of the respective End Customer and informing the Distribution User representing the Delivery Point through the Customer Register.

Meter readings are sensitive commercial data, therefore the pairing between End Customers and the Distribution Users representing them should be clearly defined so that meter readings are sent to them. Therefore, each User should have access only to the metering data of the End Customers it represents and should not be able to access End Customers of other Distribution Users subject to the Supply Code in the event of switching. Furthermore, all Users should have equal access to the meter readings of the End Customers they represent.

In order to ensure equal treatment of Distribution Users, based on the internal procedure of EDA THESS, each reading entered in Navision and in the Electronic Information Exchange System is linked to the code of the User representing the Delivery Point/End Customer. The pairing between User and End Customer prevents other Distribution Users from accessing the End Customer data of that User.

In addition, the Unit of Metering & Billing ensures that the disclosure of metering data to all Distribution Users is ensured, based on the metering cycles defined in the Metering Regulation, in order to ensure equal treatment of Distribution Users.

If a third User, other than the one who already represents the End Customer or was going to represent him/her upon a request submitted by the said End Customer, requests the disclosure of the End Customer's historical consumption data, it is verified by the competent employees that the request is accompanied and/or includes a statement by the End Customer, where he/she explicitly consents to the disclosure by the Operator of his/her consumption readings to the User.

The confidentiality of the metering data is ensured by the measures of Activity 1.6 of the CP.

The audit found that the procedure for equal access of Distribution Users and the correct sending of the measurements concerning them is adhered to. In the year 2021 there were no



cases of request for historical consumption data of End Customer by a Distribution User other than the one representing the End Customer.

### **3.6 Management of billing per User**

According to the DNOC, EDA THESS is obliged to issue distribution invoices based on the quantities of Natural Gas allocated to the End Customers attributable to each User, for all the End Customers it represents. It is also obliged to issue invoices for the provision of ancillary services provided at the request of an End Customer, Distribution User or third party.

The allocation of Natural Gas and the billing of Distribution Users resulting from this allocation affects the transparency and equal treatment of Distribution Users, as the allocation and charges must be based on the regulatory framework. Furthermore, the billing of ancillary services must be based on the prices approved by RAE in a transparent and non-discriminatory manner.

Equal treatment of all Distribution Users is ensured by using the methodology approved by RAE for the allocation of Natural Gas. Furthermore, in order to ensure non-discriminatory treatment of Distribution Users, EDA THESS applies the provisions of Article 73 of the DNOC and the DNOC Manual as regards the procedure for issuing and collecting distribution invoices. Transparency to Users is ensured through the use of the distribution tariffs approved by RAE, as well as the tariffs of ancillary services for the calculation of their charges.

The audit showed that the methodology approved by RAE for the allocation of Natural Gas is applied. The sample audit also confirmed that the tariffs approved by RAE are used for charging Distribution Users, both for basic and ancillary services. Subsequently, all information is provided and the invoices are prepared in such a way that each User can check his/her charges. Finally, the audit confirmed that the procedure for issuing and collecting the distribution users' invoices is carried out in accordance with Article 73 of the DNOC.

### **3.7 Management of the Electronic Information Exchange System**

EDA THESS operates an Electronic Information Exchange System through which it achieves interactive and controlled communication with the Distribution Network Users on the following:

- Submitting requests/complaints of their End Customers related to distribution (e.g. a new connection request submitted by the User on behalf of its End Customer).
- Information on the progress of requests/complaints
- Transmission of metering data of the End Customers represented by each User
- Keeping and updating of the Customer Register of each User
- Information on standard consumption profiles
- Geographical and schematic mapping of the Distribution Network

The Electronic Information Exchange System is the main means of communication between EDA THESS and the Users, which enables information and service while providing the same



level of service to all without discrimination, with a view to maintaining the confidentiality of commercially sensitive information.

The single way of submitting and monitoring the requests of Distribution Users to EDA THESS lies within the context of equal treatment of all Gas Distribution Users. The Electronic Information Exchange System is the main tool by which these activities are carried out.

In addition, the information contained in the Electronic Information Exchange System is classified as commercially sensitive and its confidentiality is respected accordingly.

Ensuring equal treatment of Distribution Users and transparency is achieved in accordance with the provisions of Activity 3.1 of the CP.

Ensuring the confidentiality of commercially sensitive information is achieved through its management in accordance with the measures set out in Activity 1.6 of the CP.

The audit confirmed the correct operation of the above electronic system.

### **3.8 Management of the conclusion and updating of Usage Contracts**

In accordance with DNOC, in order for Users to self-supply and/or supply Natural Gas to the End Customers they represent and fall under the jurisdiction of EDA THESS, they must first enter into a Usage Contract with EDA THESS and pay the required guarantee. However, as the User's Customer Register changes, the Distribution Users' guarantee to EDA THESS should also change, as specified in the model Usage Contract.

The conclusion and updating of a Usage Contract directly affects both the equal treatment of Distribution Users and the need for transparency in the billing of Distribution Users, while it also raises confidentiality issues, as the Usage Contract contains a wealth of commercially sensitive information.

The model Usage Contract, which is approved by RAE, is posted on the website of EDA THESS and is accessible to all Users, thus ensuring equal treatment of all Distribution Users.

At the same time, the confidentiality of the information is ensured by assigning the management of the Usage Contracts exclusively to competent employees, in order to exclude access by other Users.

The audit showed that the method of calculation of the guarantees required to be paid by the Users is respected. It is also confirmed that the model Usage Contract has been approved and posted on the website of EDA THESS and that the contracts are managed by the competent employees as designated by the relevant Unit.

### **3.9 Service Quality and Operator Efficiency Objectives**

The Operator must ensure the level of quality of its services and adopt relevant quality thresholds and performance targets, as defined in the DNOC, Par. 68.4 (OGG B' 1507/02.05.2018). In particular, the CO shall establish that, within three (3) months from the end of each year, as provided for by the DNOC, the Operator prepares and submits to RAE a



monitoring report on the implementation of standards in accordance with the indicators used to determine its performance. This report shall include in particular the following: (a) Average time in days of Connection of new Delivery Points; (b) Average time in days of Disconnection of Supply with Meter Deactivation at the request of a Distribution User; (c) Average number of days for Disconnection of Supply with Intervention to the External Installation, (d) Average number of days for Delivery Point Representation Discontinuation at the request of a Distribution User, (e) Average number of days for Meter Reactivation after Supply Suspension, (f) Average number of days for Supply Reconnection after Disconnection with Intervention at the External Installation, (g) Number of orders for Disconnection of Supply with Meter Deactivation at the request of a Distribution User which were not executed within the time limits set in Article 30 of the Code; (h) Number of orders for Disconnection of Supply with Intervention at the External Installation which were not executed within the time limits set in Article 32 of the Code, (i) Number of End Customers' complaints by subject area and by End Customers' category; (j) Average number of days for the Operator's response to requests and complaints of End Customers; (k) Average number of days for completion of External Installation and Delivery Point Connection Works.

EDA THESS shall handle requests for services in an impartial, transparent and efficient manner, without discrimination between applicants, and shall further respect the principle of priority in time when examining such requests. In particular, requests from End Customers with disabilities shall be dealt with on a priority basis.

Therefore, from the audit of the above, the CO confirms the compliance with the above described performance targets and finds that the quality limits as derived from the provisions of the DNOC are adopted, in accordance with letter no. 5361/06.04.2020 The "*Annual Report of the Thessaloniki Distribution Network & Thessaly Distribution Network for the year 2021*" will be communicated to the Authority in due time, by 31/03/2022.

### **3.10 Contracts with Affiliates**

The Company, based on **RAE's decision No. 676/2020/O-81864**, has entered into two (2) contracts with DEDA S.A. for the provision of natural gas distribution network operation services, low pressure network activation, and operation and maintenance of distribution networks respectively in the areas of responsibility of the latter and one (1) contract for the supply of equipment for large vehicles for the technical needs of the Unit of Operation and Maintenance. In particular, it has concluded the service contract dated 01/04/2020 (No. 018/2021, in force from 16.02.2021-16.09.2021), the service contract dated 16.09.2021 (No. 528/2021, in force from 16.09.2021-16.12.2021) and the equipment supply contract dated 14.12.2021 (No. 666/2021).

The rules of independence and impartiality of the Company towards the contracting company were fully respected in the conclusion of the contracts.



According to the Company's letter of 20.12.2021 to RAE (No. 17363), EDA THESS applied for certification as a Natural Gas Distribution Network Operator under Articles 80 F and 80 G.

## CHAPTER C

### ACTIVITIES FOR THE ORGANISATION AND IMPLEMENTATION OF THE CP - CONCLUSION

#### 1. Adaptation of the Compliance Program to new legislation and regulations

In addition to the existing regulatory and general legal framework for the operation of EDA THESS, under which the current Compliance Program was prepared, the Company will be required in the future (is already required) to incorporate in its organization and operation the new legislative or regulatory provisions and instructions provided by RAE and other supervisory authorities. On 25 May 2018, the General Data Protection Regulation 2016/679 (GDPR) came into force, which was taken into account in the approved CP.

Based on the above, the CO informed the Company about the ability of the Program to adapt immediately to new data, to update its requirements and to become consistently effective in its mission.

#### 2. Conclusions

The policy of monitoring, recognition and compliance with the company's obligations arising from the European and national regulatory framework was adhered to by the Operator for the audited year. The audits carried out for the period from 01.01.2021 to 31.12.2021, revealed the satisfactory implementation of the audit points of the Compliance Program related, for example, to the management of regulatory issues of the Distribution Network Operators, while no deviation from the current legislative and regulatory framework, as well as the provisions of the CP was observed.

Yours sincerely

Theodore Panagos

Attorney at Law

Compliance Officer