

Draft Framework Guidelines on Interoperability Rules and Data Exchange for the European

Gas Transmission Networks Public Consultation - Questionnaire

16 March 2012

**PC-07- PUBLIC CONSULTATION ON DRAFT FRAMEWORK GUIDELINES ON INTEROPERABILITY RULES AND DATA EXCHANGE FOR THE EUROPEAN GAS**

**TRANSMISSION NETWORKS**

**QUESTIONNAIRE**

**Please provide the Agency with your full contact details, allowing us to revert to you with specific questions concerning your answers.**

*Name: Peter Meeuwis*

*Position held: Chairman of the Executive Committee*

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*Name and address of the company you represent: European Association for the Streamlining of Energy Exchange – gas, EASEE-gas*

**1. Scope and application, implementation (Chapter 1 of the Framework Guidelines**

**(the ‘FG’)**

* 1. Do you consider that the FG on interoperability and data exchange rules should harmonise these rules at EU level, as follows:

1. At interconnection points only?
2. Including interconnection points and where appropriate points connecting TSOs’ systems to the ones of DSOs, SSOs and LSOs (to the extent cross-border trade is involved or market integration is at stake)?  
   Producers should additionally be included in the above considered market players.
3. Other option? Please explain in detail and reason.
4. I don’t know.

1.2. Do you consider that for any of the above options the level of harmonisation1 shall be  
(Section 1.b of the FG):

a. Full harmonisation: the same measure applies across the EU borders, defined in the network code?  
Full harmonization should be pursued in the areas where full harmonization would be possible otherwise a regional approach can be followed.

1 Harmonisation is used in the meaning of replacing two or more legal systems with one single system.

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b. Harmonisation with built-in contingency: same principles/criteria are set with a  
possibility to deviate under justified circumstances?

c. No additional harmonisation, meaning rules are set at national level, if they deemed  
necessary by the national authorities, which may include either NRAs or the  
government?

1.3. Shall any of the issues raised in the FG (Interconnection Agreement, Harmonisation of

units, Gas Quality, Odorisation, Data exchange, Capacity calculation) get a different scope from the general scope as proposed in section 1.b. of the FG (and as addressed in the previous question)? Please answer by filling in the following table, ticking the box corresponding to the relevant foreseen scope.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | IAs | Units | Gas Quality | Odorisation | Data Exchange | Capacity Calculation |
| Full harmonization | X | X |  |  | X |  |
| Partial harmonization |  |  | X |  |  |  |
| Business as usual |  |  |  | X |  | X |

Odorisation should be regulated by national authorities

Gas quality will need a regional approach in order to solve existing differences.

1.4. What additional measures could you envisage to improve the implementation of the

network code? Please reason your answer.

**2. Interconnection Agreements**

2.1. Do you think that a common template and a standard Interconnection Agreement will

efficiently solve the interoperability problems regarding Interconnection Agreements and/or improve their development and implementation?

a. Yes.

b. No.

c. I don’t know.

d. Would you propose additional measures as to those proposed? Please reason your  
answer.

e. Would you propose different measures as to those proposed? Please reason your  
answer.  
In general, a common template and a standard Interconnection Agreement on standard topics would be of benefit. Attention should be paid to how the standard will operate in practice: if the standard is too open it will not be of benefit to parties, whereas if too detailed it will not be possible to agree upon and could not be used. A standard Interconnection Agreement on topics may be workable.

2.2. Do you think that a dispute settlement procedure as laid down in the text will efficiently

contribute to solving the interoperability problems of network users regarding Interconnection Agreements and their content?

a. Yes

b. No.

c. I don’t know.

d. Would you propose additional measures as to those proposed? Please reason your  
answer.

e. Would you propose different measures as to those proposed? Please reason your  
answer.  
In EASEE-gas’ view, this reflects how interconnection agreements are concluded in practice.

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2.3. Do you think that a stronger NRA involvement in the approval of the Interconnection

Agreements could be beneficial? Please explain in detail and reason.

a. Yes.

b. No.

NRA involvement should only be as a last resort and would be necessary only if, due to regulatory reasons, market parties cannot reach an agreement.

c. I don’t know.

**3. Harmonisation of Units**

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

a. Yes.

b. No, conversion is sufficient in all cases.

c. I don’t know.

d. Would you propose additional measures as to those proposed? Please reason your  
answer.

e. Would you propose different measures as to those proposed? Please reason your  
answer.

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

a. Easier technical communication among TSOs.

b. Easier commercial communication between TSOs and network users.

c. Both.

d. No value added.

e. I don’t know.

f. Other views. Please reason your answer.

3.3. Shall harmonisation be extended to other units? Please reason your answer.  
 No, the proposed units are enough to promote market integration.



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**4. Gas Quality**

1. Please provide your assessment on the present proposal; in particular assess the provisions on ENTSOG gas quality monitoring, dispute settlement and TSO cooperation. Would these measures address sufficiently the issues that are at stake? Please reason your answer. EASEE-gas will provide more information at the stakeholder workshop.
2. Do you consider that a technically viable solution to gas quality issues that is financially reasonable will most likely result from:

a. Bilateral solution between concerned stakeholders.

b. Solutions to be developed cross-border by TSOs, to be approved by NRAs and cost-  
sharing mechanism to be established.

c. The establishment of a general measure in the Framework Guidelines, setting a  
comprehensive list of technical solutions to select from.

d. I don’t know.

e. Other option. Please reason your answer.

**5. Odorisation**

5.1. Please provide your assessment on the present proposal. Would the measure proposed

address sufficiently the issues that are at stake? Please reason your answer. No remarks

**6. Data exchange**

1. Please provide your assessment on the present proposal. Would the measures proposed address sufficiently the issues that are at stake? Please reason your answer. The issues and proposed measures are sufficiently pointed out. Please see comments on text.
2. Regarding the content of this chapter,

a. Data exchange shall be limited to the communication format.  
This should be limited to only on how to communicate.

b. Data exchange shall define both format and content, at least regarding the following  
points: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Please reason your answer.

c. I don’t know.

d. Other option. Please reason your answer.

6.3. ENTSOG may support the exchange of data with a handbook of voluntary rules. Please  
share your views about such a solution. EASEE-gas believes that it would be good to have general principles and rules outlined in the network code and for the network code to be linked to the handbook where specific solutions are laid down.



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**7. Capacity calculation – The Agency view is that discrepancy between the maximum**

**capacities on either side of an interconnection point, as well as any unused potential to maximise capacity offered may cause barriers to trade.**

1. Please provide your assessment on the present proposal. Would the measures proposed address the issues that are at stake? Discussions about discrepancies in capacity on interconnection points should be solved between TSOs. Network users should not be involved in or bothered with this discussion. The only interest of market parties is to use the maximum available capacity. (The same is not realistic)
2. Would you propose additional measures as to those proposed? Please reason your answer. Market parties should have the opportunity (open season) to ask for more capacity on IPs. Extension of capacity on both sides of the IPs should be coordinated between the involved TSOs.
3. Would you propose different measures as to those proposed? Please reason your answer. No

**8. Cross-border cooperation**

1. Please provide your assessment on the present proposal. Present proposal is okay.
2. Do you have any other suggestions concerning cross-border cooperation? Please reason your answer. See remark at 7.2.

**9. Please share below any further comments concerning the Framework Guideline**

**on Interoperability and Data Exchange Rules.**All issues related to interoperability (such as the gas day and nomination which are currently covered by other Framework Guidelines) should ultimately be topics for a single Interoperability Rules Network Code. Therefore these issues should be included now in the Interoperability Rules and Data Exchange Network Code in order to be able to delete them from other Network Codes.

Thank you very much for your contribution.

**Agency for the Cooperation of Energy Regulators**5