# **Draft Framework Guidelines “Interoperability and Data Exchange Rules for European Gas Transmission Networks”**

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***1. Scope and application, implementation (Chapter 1 of the Framework Guidelines (the ‘FG’)***

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

*a. At interconnection points only?*

*b. 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)?*

*c. Other option? Please explain in detail and reason.*

*d. I don’t know.*

Gastransport Nord GmbH (GTG) thinks that just interoperability in order to ensure cross border trading at interconnection points should be part of the FG. Therefore, GTG chooses option a.

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

*a. Full harmonisation: the same measure applies across the EU borders, defined in the network code?*

*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?*

Option c. Harmonisation should be limited to a level which ensures standard regulation for traders to manage cross border activities. Therefore, we do not see any need for additional harmonisation inland.

*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* | *Orodisation* | *Data Exchange* | *Capacity Calculation* |
| *Full harmonisation* |  |  |  |  |  |  |
| *Partial harmonisation* | *X* | *X* | *X* | *X* | *X* | *X* |
| *Business as usual* |  |  |  |  |  |  |

*1.4. What additional measures could you envisage to improve the implementation of the network code? Please reason your answer.*

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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.*

Option a. GTG thinks that the implementation of an IA helps to improve the interoperability but the regulatory should be limited to a minimum extend to ensure operation. Details not implemented in an IA can be solved bilaterally between parties.

*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*

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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.*

*c. I don’t know.*

Option a. The NRA has a good overview of the specific characteristics of the home market. Hence, the knowledge of NRA’s can be helpful in the process to develop a NC.

*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.*

Option e. We think that just units which are related to shippers should be focused such as energy, volume as well as gross calorific value.

*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.*

Option b.

*3.3. Shall harmonisation be extended to other units? Please reason your answer.*

No. We don’t see additional advantages.

*4. Gas Quality*

*4.1. 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.*

We assume that the calculation methods according to quality vary between European TSO’s. Therefore, we see a need to harmonize this issue indeed – but this should be based on the best cost-benefit ratio.

*4.2. 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.*

The technical solutions to gas quality should be based bilaterally between TSOs at cross border points as we think that they are most experienced to keep quality ranges. These quality ranges are also part of long term import contracts and hence requirements of shippers at cross border points. Nevertheless, especially renewable gas sources, e.g. biomethane and power to gas, need to be harmonized for all members.

*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.*

Odorisation in the gas transmission systems should not be allowed as this indicates technical problems in facilities, such as storage facilities. Therefore, odorisation should only happen where domestic end consumers are affected.

*6. Data exchange*

*6.1. Please provide your assessment on the present proposal. Would the measures proposed address sufficiently the issues that are at stake? Please reason your answer.*

*6.2. Regarding the content of this chapter,*

*a. Data exchange shall be limited to the communication format.*

*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.*

Option a.

*6.3. ENTSOG may support the exchange of data with a handbook of voluntary rules. Please share your views about such a solution.*

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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.*

*7.1. Please provide your assessment on the present proposal. Would the measures proposed address the issues that are at stake?*

As TSOs already publish their calculation methodology we do not see any additional harmonisation requirement.

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

no

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

no

*8. Cross-border cooperation*

*8.1. Please provide your assessment on the present proposal.*

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*8.2. Do you have any other suggestions concerning cross-border cooperation? Please reason your answer.*

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*9. Please share below any further comments concerning the Framework Guideline on Interoperability and Data Exchange Rules.*

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