

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.

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Name and address of the company you represent: Gaslink (TSO), Gasworks Road, Cork City, Ireland.

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.

(a) With a view to harmonisation of some rules across all network users in the future

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?

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

- 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?

(b) Not all rules are suitable for harmonisation across the EU; for example gas quality, where neither the cost benefit analysis nor the operational practicalities support full harmonisation. However other rules (for example the Interconnection Agreement, units and capacity calculations) lead themselves to full harmonisation.

1.3. Shall any of the issues raised in the FG (Interconnection Agreement, Harmonisation of units, Gas Quality, Odourisation, 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	Odourisation	Data Exchange	Capacity Calculation
Full harmonization		✓			✓	✓
Partial harmonization	✓		✓	✓		
Business as usual				✓		

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

N/A

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.

(d) Operational rules should be included, such as the requirement for TSOs to act as reasonable and prudent operators at all times; and in the event of an emergency, adjacent TSOs shall have an obligation to co-operate in such an event.

The gas quality section should be prescriptive and give a non-exhaustive list of parameters to be included in the IA. These should include, but not be limited to:

- GCV
- % CO₂
- Wobbe-index
- Total sulphur
- Oxygen
- Hydrogen Sulphide
- Hydrogen
- Soot index
- Incomplete combustion factor
- Hydrocarbon dewpoint

22. Do you think that a dispute settlement procedure as laid down in the text will efficiently
interconnectors, agreements and parameters, problems of network users regarding

- 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.

(a) For such a procedure to be efficient and effective its criteria and parameters should be clearly expressed in the Framework Guideline.

23. 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.

(a) Interconnection Agreements should be negotiated and agreed between the relevant TSOs with NRA oversight / support as appropriate.

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.

(a) Harmonisation of units across the EU will support cross-border trade and promote the development of competitive and liquid markets. However the introduction of harmonised units should be scheduled in conjunction with other Interoperability harmonisation, such as IT systems, to avoid additional cost to the network user.

32. 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.

(c)

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

All units required for gas quality and quantities should be harmonised.

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.

Gaslink supports the inclusion of these provisions in the Framework Guidelines. Network Codes and Interconnection Agreements should include provisions for gas quality monitoring, dispute settlement and TSO co-operation with regard to gas quality. Interconnection Agreements should include an agreed set of gas quality parameters.

- 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.

(b)

5 Odourisation

- 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.

National requirements and solutions, which will not adversely impact safe operation of the network, should be taken in to account. In Ireland odourisation is at Transmission level. Any changes to our current solution may result in substantial and unwarranted costs to the Irish gas consumer.

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.

There is no provision for the management of incompatibility between the different systems. A roadmap for the development of a Pan European approach should be generated. (A

staged/regional approach may be a solution to this issue or alternatively a common platform which accommodates multiple data exchange protocols).

- 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: [market and operational data](#). Please reason your answer.
 - c. I don't know.
 - d. Other option. Please reason your answer.

(b) [Market and operational data identified during the development of all ENTSOG network codes](#).

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

[While the development of this handbook is welcomed, the voluntary nature of it will limit the implementation of the rules in the handbook and thus hinder the harmonisation of interoperability and in turn the development of an integrated, competitive EU market. A solution would be to reference the handbook in the Interoperability Network Code thus accommodating a quicker revision process for data exchange protocols and messages, which by their nature are liable to rapid changes.](#)

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?

The proposal addresses the issues at stake; the Network Code should define “a procedure for identifying and reasonably dealing with any discrepancies”.

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

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

8. Cross-border cooperation

8.1. Please provide your assessment on the present proposal.

Gaslink agrees with the present proposal.

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

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

Thank you very much for your contribution.

Agency for the Cooperation of Energy Regulators