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Public Consultation on Capacity Offering and Use at the Gas Interconnection Points Located at the Borders of the EU and the Energy Community

Fields marked with * are mandatory.

1. Questionnaire

When providing your input to the questionnaire, please consider the following guidance:

- “Technical approaches” means engineering solutions, e.g. looping a pipeline or managing flows with pressure differentials;
- “Commercial approaches” means contractual terms and conditions, e.g. transferring the use of capacity rights to another IP for an agreed fee when the contracted capacity is not available;
- “Market design approaches” means rules that are typically part of network codes, e.g. setting up virtual interconnection points.

For each IP, you can select (by ticking the available box) more than one of the above approaches to improving the availability and the terms of use of capacity. Please provide in the text box any further considerations and recommendations regarding each of the approaches that you have selected. Please include your name, organisation, contact email, and country on your respondent sheet.

Replies to the consultation can be submitted by **30 June 2021 23:59 hrs (CET).**

2. Personal data and confidentiality

☑ I have read and understood ACER’s Privacy Statement (see below) and Data Protection Notice on Interactions with Stakeholders (link), as well as ECS’ Procedural Act on the Secretariat’s Data Protection Policy (link):

ACER_and_ECS_joint_public_consultation_statement.pdf

The response which I submit to the consultation shall be considered by ACER and ECS as (choose one):

- (●) Non-confidential (public)
- ( ) Confidential (in accordance with Article 9 of ACER’s Decision No 19/2019 concerning ACER’s Rules of Procedure)

3. Respondent information

Please specify your name, surname:

Position:

Organisation:

SNTGN Transgaz SA

Organisation address:

1st Cl Motaș Square, 551130 Medias, Sibiu County, Romania

Email

Country:

RO - Romania

Activity of respondent:

- ○ Trader/Supplier/Importer/Exporter
- ○ Regulatory authority
- ◉ Other (please specify)

Please specify, if other:

Transmission System Operator (TSO)

Please list the borders (IPs) between the EU MS and the EnC CPs and/or between EnC CPs that you are concerned with. Enter N/A when you are not currently active at any such border IP.

The physical IPs between Romania and the Contracting Parties of the Energy Community are:
- IP Medieșu Aurit (RO)/Tekovo (UA) (EIC code: 21Z000000000158K);
- IP Isaccea 1 (RO)/Orlovka 1 (UA) (EIC code: 21Z000000000304Z);
- IP Isaccea 2 (RO)/Orlovka (UA) (EIC code: 21Z000000000305X);
- IP Isaccea 3 (RO)/Orlovka (UA) (EIC code: 21Z000000000306V);
- IP Isaccea (Import) (RO)/Orlovka (UA) (EIC code: 21Z000000000151Y);
- IP Ungheni (MD) (EIC code: 21Z000000000356G).

IP Medieșu Aurit (RO)/Tekovo (UA) (EIC code: 21Z000000000158K) and IP Isaccea (Import) (RO)/Orlovka (UA) (EIC code: 21Z000000000151Y) are part of VIP Medieșu Aurit – Isaccea (Import) (RO) (EIC code: 21Z000000000373G), position 226 in ENTSOG Capacity Map;

Please provide further details regarding your answers related to two previous questions, if any:

IP Isaccea 1 (RO)/Orlovka 1 (UA) and IP Ungheni (MD) are operational IP on the date hereof. For the other interconnection points the Interconnection Agreements are being negotiated.

4. Topic 1: Fair and transparent terms of access to services, including capacity contracts, network codes and contracts for auxiliary services

1. In your view, what are the possible **technical approaches** to ensure adequate and expected free movement of gas between market areas to locations where it is valued by gas market participants? Your answer may consider any or all of the following.

- [ ] Looping(s)
- [x] Pressure management
- [ ] Other

1.2. If pressure management, please indicate at which IPs:

Free, adequate and expected movement of gas between market areas to the locations where it is assessed by gas market participants is possible through pressure management in the following IPs:
- VIP Medieșu Aurit – Isaccea (Import) (RO) (EIC code: 21Z000000000373G);
- IP Isaccea 1 (RO)/Orlovka 1 (UA) (EIC code: 21Z000000000304Z);
- IP Isaccea 2 (RO)/Orlovka (UA) (EIC code: 21Z000000000305X);
- IP Isaccea 3 (RO)/Orlovka (UA) (EIC code: 21Z000000000306V);
- IP Ungheni (MD) (EIC code: 21Z000000000356G).

2. In your view, what are the **possible commercial approaches** to ensure adequate and reliable free movement of gas between market areas to locations where it is valued by gas market participants? Your answer may consider any or all of the following.

- [ ] Capacity contract transfer to another IP (e.g. substitute alternative paths where the primary booked transportation route is not available)
- [ ] Capacity use shift by type and time, e.g. transferability (at no additional charge) of unusable capacity on an interruptible basis with priority determined by time of transfer (earlier bookings take priority)
- [ ] Capacity conversion right by user and release of converted capacity (if various types of capacity are offered by the TSO)

- [ ] Short haul services
- [ ] Time capacity swaps between users
- [ ] Greater firmness of virtual reverse flow capacity
- [ ] Capacity swaps between users for various types of capacity (firm, interruptible, direct, reverse, virtual, bundled) throughout the year or during periods of maintenance only
- [x] Increased capacity availability on an interruptible basis
- [x] Other

2.1. Please explain if other and indicate relevant IPs:

Network Users' access to the secondary capacity market.

2.2. For Q2, please explain your choice(s) and indicate relevant IPs:

We consider that the application of the provisions of the European regulatory framework ensures efficient solutions for the free movement of gas.
The IPs are the following:
- VIP Medieșu Aurit – Isaccea (Import) (RO) (EIC code: 21Z000000000373G);
- IP Isaccea 2 (RO)/Orlovka (UA) (EIC code: 21Z000000000305X);
- IP Isaccea 3 (RO)/Orlovka (UA) (EIC code: 21Z000000000306V);
- IP Isaccea 1 (RO)/Orlovka 1 (UA) (EIC code: 21Z000000000304Z);
- IP Ungheni (MD) (EIC code: 21Z000000000356G).

3. In your view, what are the possible market design approaches to ensure adequate and expected free movement of gas between market areas to locations where it is valued by gas market participants? Your answer may consider any or all of the following.

- [x] Virtual interconnection points
- [ ] Firm backhaul capacity
- [ ] Increased transparency on contractual the terms and conditions at IPs (e.g. right information of the required type and scope, at proper moments, to all concerned parties, etc.)
- [x] Increasing supply sources
- [ ] Reducing market concentration
- [x] Other

3.1 Please explain if other:

Another approach is to provide interruptible capacity, backhaul type in unidirectional IPs, in the opposite direction to the physical flow of natural gas (within the firm capacity reserved in the direct direction of flow).
Note: We do not understand the concept of firm backhaul capacity.

3.2 Please explain your choice(s):

The above approach ensures the adequate and expected free movement of gas between market areas to the locations where it is assessed by gas market participants as:
- ensures an increase in flexibility and efficiency both in the operation of the transmission system and in the use of transmission capacity by Network Users;
- allows gas to be traded even in the direction in which the natural flow of natural gas is not possible.

4. In case you wish to report any other issues concerning market integration not covered in the questions above, please outline here the approaches and the issues they address:

A potential element of market integration could be the implementation of the applicable rules on Network Users' access to VTP/balancing market in Energy Community countries.

5. Topic 2: Market Integration

5. In your view, what are the possible available and future instruments and frameworks which can be used to ensure that capacity demand is adequately met in order to better serve market integration?

- ○ Using the tools provided by the 10-Year Network Development Plan (TYNDP)
- ○ Using the tools provided to projects of common interest (PCIs) or Projects of Energy Community Interest (PECIs) or Projects of mutual interest (PMIs)
- ◉ Using both the tools available in TYNDP and PCIs / PECIs /PMIs
- ○ Using the tools of the Network Codes
- ○ A combination of PCIs/ PECIs/PMIs and Network Codes
- ○ Other (please explain)

5.1. Please explain if other:

5.2. Please describe in detail the relevant aspects of the chosen selection(s):

Adequate capacity demand for better market integration can be achieved through the following tools:
- the incremental capacity process described in the CAM-NC which sets out the steps that adjacent TSOs and market participants are required to go through and / or
- promoting projects of common interest.

6. Topic 3: Availability of capacity (capacity availability, allocation and use) and maintenance and gas quality issues (interoperability)

6. In your view, what are the three best approaches (possibly as indicated in questions 1-5 above) that will ensure that network users can benefit from reliable allocation of capacity offers and optimal use of existing network systems and capacity, including during times of planned and unplanned maintenance? Please indicate below:

The following approaches ensure that Network Users can benefit from a reliable allocation of capacity offers and optimal use of existing systems and capacity (including during scheduled/unscheduled maintenance work):
- Providing interruptible backhaul capacity in unidirectional IP, in the opposite direction to the physical flow of natural gas (within the limit of the firm capacity reserved in the direct flow direction);
- Creation of virtual interconnection points (where possible);
- Use of tools available in both TYNDP, PCI / PECI / PMI and network codes.

7. In your view, what are the three best approaches (possibly as indicated in questions 1-5 above) to gas transmission system maintenance with the purpose of minimising disruption of flows? Please indicate the approaches and the issues they addresses:

In order to minimize the interruption of gas flows in case of maintenance of the transmission system the coordination by the adjacent TSOs of the maintenance plans of the interconnected transmission systems, of the interruption procedures, according to the provisions of CAM-NC and the creation of virtual interconnection points is necessary (where available).

8. In your view, what are three best approaches (possibly from the ones indicated in questions 1-5 above) to handling emergencies (transmission, supply cut offs, capacity)? Please indicate the approaches and the issues they address:

For emergency situations management, the best approaches are:
- Cooperation of Competent Authorities in the process of elaboration of Preventive and Emergency Plans;
- Conclusion of an Intergovernmental Agreement between the Member State and the Contracting Party.

9. In your view, what are three best approaches to gas quality measuring rules, specifications and standards? Please describe the approaches and the issues they address:

Adoption of a European gas quality standard with the least restrictive minimum quality requirements at European level, applicable at all interconnection points both within the EU and at the EU-EEC interface. The National Regulatory Authorities will establish / adopt these minimum quality requirements under the coordination of ACER.

10. In your view, what are the three best approaches to managing gas measurement rules and standards? Please describe the approaches and the issues they address:

Compliance with the rules on natural gas measurement provided in the INT-NC.
Compliance with the provisions of standard EN1776 for Class A gas measuring installations as well as measuring methods and measuring equipment shall be in accordance with the applicable EN and ISO standards, in the original English language versions.
The gas metering station shall be located in the territory of the European Union in order to make the application of European gas measurement rules and standards mandatory.

11. If you wish to note any other issue(s) related to the availability of capacity at IPs at EU/ EnC borders, and not already covered by the questions 6-10 above, please describe the issues and their potential solutions of technical, commercial or market design nature:

For IPs that are not currently operational, the available firm / interruptible capacity will be made available to the market after the conclusion of the IA with the adjacent TSO.

12. In your view, what are the three best approaches to ensure network users can manage the risks related to the firmness of transport contracts and balancing adequately?

Implementation of applicable rules on NU access to VTP / balancing market in Energy Community countries.

13. In your view, what is the best approach the TSOs need to undertake to improve the exchange of information amongst market participants? Please choose one below:

- [x] Common data exchange solutions
- [x] Communication procedures during emergencies
- [x] Communications in instances of interruptible capacity and transmission
- [ ] Other (please explain)

13.1 Please explain if other:

7. Topic 4: Issues related to Network Codes Topic

When commenting on a specific IP, please use the IP name and code provided in Table 1.

14. The NCs are mandatory to be applied at the borders between two EnC CPs. In your view, which NCs should be implemented by which IP at the EU and EnC border? Please list separately each IPs and NC relevant to that IP:

The following European codes should be implemented in IPs bordering the EU and the Energy Community:
- VIP Medieșu Aurit – Isaccea (Import) (RO) (EIC code: 21Z000000000373G): INT-NC, CAM-NC, BAL-NC;
- IP Isaccea 1 (RO)/Orlovka 1 (UA) (EIC code: 21Z000000000304Z): INT-NC, CAM-NC, BAL-NC;
- IP Isaccea 2 (RO)/Orlovka (UA) (EIC code: 21Z000000000305X): INT-NC, CAM-NC;
- IP Isaccea 3 (RO)/Orlovka (UA) (EIC code: 21Z000000000306V): INT-NC, CAM-NC;
- IP Ungheni (MD) (EIC code: 21Z000000000356G): INT-NC, CAM-NC, BAL-NC.

15. Regarding reverse flow modalities, in your view, are the firm physical bi-directional capacity available at the IP(s) sufficient under
a) normal conditions
b) maintenance conditions and
c) emergency conditions?

Please indicate in your answer the specific IP(s) where at least one of the a-b-c above are not met (also indicating which one), and any additional comments you may have.

With regard to reverse flow modalities, the following IPs are not technically bidirectional under any of the conditions set out in points a), b) and c):
- VIP Medieșu Aurit – Isaccea (Import) (RO) (EIC code: 21Z000000000373G);
- VIP Isaccea 2 (RO)/Orlovka (UA) (EIC code: 21Z000000000305X);
- VIP Isaccea 3 (RO)/Orlovka (UA) (EIC code: 21Z000000000306V).

16. Regarding reverse flow modalities, in your view, are the firm virtual backhaul bi-directional capacities available at the concerned IP(s) sufficient under
a) normal conditions
b) maintenance conditions and
c) emergency conditions?

Please indicate in your answers the specific IP(s) where at least one of the a-b-c above are not met (also indicating which one, and any additional comments you may have.

Note: We do not understand the concept of firm virtual backhaul bi-directional capacities.

17. In your view, which IP(s) operate insufficient firm capacities one way only, and which way (1-2 or 2-1 – for reference see this table)? Please indicate in your answers the specific IP(s) being addressed and any additional comments you may have:

In the case of IP Ungheni (MD) and IP Isaccea 1 (RO) / Orlovka 1 (AU) the available firm capacities are sufficient in both directions.
In the case of other IPs which are unidirectional IPs (UA-RO direction), firm capacity is sufficient.

18. If you wish to comment on any other issue(s) related to the availability of capacity at the concerned IPs, please provide your comment(s) here:

The evaluation of the firm capacity in IP is necessary to be performed according to the provisions of the incremental capacity process in CAM-NC.
The capacity in IP Isaccea 1 (RO) / Orlovka 1 (AU), in the direction of RO-AU is currently interruptible until the issues related to the minimum natural gas quality requirements are resolved.

8. Topic 5: Issues related to particular IPs

19. In your view, what are the best possible future approaches to ensure that network users enjoy fair and transparent access to capacity and other network services at the following IPs, on competitive market terms? Please consider using the definitions and the suggested breakdown of options as available in questions 1-3 above. You may also suggest other approaches.

We consider that the best approach for ensuring the access by Network Users to the transport capacity in competitive market conditions in this IP is the implementation of the rules on access to the transmission system, established by the European regulatory framework.

20. IP Drozdovichi - Drozdowicze:

21. IP Hermanowice:

22. IP Uzhgorod / Velke Kapushany:

23. IP Budince:

24. IP Beregovo / Beredgaroc:

25. IP Beredgaroc / Beregovo:

26. IP Tekovo Mediesu Aurit:

We consider that the best approach for ensuring the access by Network Users to the transport capacity in competitive market conditions in this IP is the implementation of the rules on access to the transmission system, established by the European regulatory framework.
Note: IP Mediești Aurit (RO) / Tekovo (UA) (EIC code: 21Z000000000158K) and IP Isaccea (Import) (RO) / Orlovka (UA) (EIC code: 21Z000000000151Y) are part of PIV Mediești Aurit - Isaccea (Import) (RO) (EIC code: 21Z000000000373G), position 226 in ENTSOG Capacity Map;

27. IP Oleksiivka:

28. IP Ananiv:

29. IP Lymanske:

30. IP Iasi / Ungheni:

We consider that the best approach for ensuring the access by Network Users to the transport capacity in competitive market conditions in this IP is the implementation of the rules on access to the transmission system, established by the European regulatory framework.

31. IP Grebenyki:

32. IP Kaushany - Caushany:

33. IP Kireevo / Zajecar:

34. IP Kuystendil / Zidilovo:

35. IP Loznica / Zvornik:

36. IP Kiskondorozsma - Horgos:

37. Other comments and suggestions.

Please provide below any other comments and suggestions you may have regarding the matter of the consultation.

Thank you!

Contact

Contact Form