

Responses to Consultation on Draft Code on Balancing

Please complete the fields below and send via email using the subject, Response to Consultation on the Draft Code on Balancing, to info@entsog.eu by 17:00CET on June 12th.

Please note that respondents are not required to respond to all questions below.

In sending your response submission by email, you are confirming that ENTSG can disregard any standard e-mail text about not disclosing email contents and attachments.

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ENTSOG seeks to publish response once the consultation has ended. Please indicate here whether your response is confidential (in whole or part)

☐ In whole, meaning nothing to be published

☐ In part, meaning a version with your marked confidential sections excised by ENTSOG could be published



POSITION PAPER

on the Draft Code on Gas Balancing in Transmission Systems

GEODE, the European Association of power and gas distributors, appreciates the opportunity to comment on the ENTSOG's Draft Code on Balancing in Transmission Systems.

GEODE thanks the ENTSOG for the involvement of the DSO's in the elaboration process of the Code and for the excellent cooperation. The several meetings that took place between the ENTSOG and the DSO-Associations on Information Provisions (Eurogas-DSO, CEDEC and GEODE) were from our point of view a demonstration of a fruitful cooperation that should be continued during the further development of the Code and other related provisions, taking into account the fundamental role of the DSO's in the balancing system.

GEODE's major concern is the clarification of the role and the responsibilities of the DSOs in the Gas balancing System. It should be clarified that not all market roles and functionalities of the DSOs must be harmonised to design a uniform European balancing system.

In this respect, it is important to emphasize that GEODE does not wish to prevent a harmonised European market, but just wishes to safeguard the legitimate interests of the

distribution system operators. Also in a regulated system, the interests between TSO and DSO are not always the same.

CHAPTER IX. INFORMATION PROVISION OBLIGATIONS /

Questions 38 - 42

For the DSO's the Information Provision Obligations are particularly relevant. In principle, GEODE welcomes the provisions on information transmission in Chapter IX NC Gas Balancing. But from our point of view, they need further clarification. The Chapter IX has a very complex structure which can impede the understanding and the correct implementation of the provisions. The multitude of different systems and models could negatively affect the trade on the European gas market.

According to the provision in Art. 44, item 2 of the Draft Code, GEODE would like to stress its willingness to participate in the process of the cost benefit analysis of the information provisions and to provide in that regard its informational support.

CHAPTER III. CROSS-BORDER COOPERATION /

Questions 3 and 4

GEODE would like to point out that for DSO's the merger of balancing zones, as provided in Art. 9, would implicate substantial implementation work and costs. For that reason, it is important to include the DSO's in the elaboration of the details of this process. Therefore, the DSO's should be included in the consultation process on proposals to integrate European gas market, as laid down in Art. 10, and in the ENTSG review progress concerning the harmonisation of balancing rules in adjacent Balancing Zones, as laid down in Art. 11 of the Draft Code. GEODE would welcome for that purpose the continuation of the Working group between the ENTSG and the DSO-Associations.

GEODE is looking forward to having further constructive and fruitful cooperation with the ENTSG on the development of the gas balancing rules.

Brussels, 12 June 2012