

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.

General Remarks:

Please regard, that this response is a cooperation of BDEW (German Association of Energy and Water Industries) and VKU (Association of municipally determined infrastructure undertakings and economic enterprises) from Germany.

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In whole, meaning nothing to be published

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

CHAPTER II. BALANCING SYSTEM

Question 1 – Do you concur that the implementation of a Virtual Trading Point via the inclusion of the Trade Notification and Allocation scheme in the Balancing Network Code will contribute to the delivery of a properly functioning market? If not, please propose an alternative and provide justification.

Response:

BDEW and VKU agree with the opinion that the implementation of a Virtual Trading Point via the inclusion of the Trade Notification and Allocation scheme in the Balancing Network Code will contribute to the delivery of a properly functioning market.

Question 2 – in the context of the proposed Trade Notification and Allocation scheme, does the Draft Code provide sufficient harmonisation within? If not, what would be the preferred basis for any additional harmonisation?

Response:

BDEW and VKU like to suggest clarifying the term “Trade Notification” as this is not done in the definitions of Appendix 1. As it is the understanding that it refers to the nomination of gas quantities at the virtual point.

Additionally the proposed timeline for the termination of interim measures no later than five (5) years after the coming into force of the Network Code is considered to long. From the BDEW and VKU point of view the timeline should be shorter (e.g. 3 years) because harmonization should be as soon as possible fulfilled.

CHAPTER III. CROSS-BORDER COOPERATION

Question 3 - Do you agree that ENTSG should issue the review of the progress of harmonisation of balancing rules report at the latest two year after the implementation of the network code and then biannually thereafter? If not, please propose an alternative and provide justification to support your proposal (and /or counter Draft Code's approach).

Response:

BDEW and VKU support the regular review of the progress of harmonisation of balancing rules by ENTSG.

Question 4 – Do you agree with the proposed review process (including the issuing of a report (in the public domain)? If not, please propose an alternative and provide justification to support your proposal (and /or to counter Draft Code's approach).

Response:

BDEW and VKU support the proposed review process (including the issuing of a report (in the public domain)).

CHAPTER IV. OPERATIONAL BALANCING

Question 5 – Do you agree that TSOs should, under specific circumstances, be allowed to trade in adjacent markets? If so, please explain under what circumstances.

Response:

Trading in adjacent markets should be primarily the role of the shipper. However if the development of the wholesale market is not transparent enough and/or insufficient, it can be beneficial if the TSO is allowed to procure flexible gas in adjacent markets e.g. if the combined price of capacity booking and the procured volumes proves to be cheaper than the procurement of a product with equivalent effect at the own trading point. BDEW and VKU would like to emphasize that the possibility to trade in adjacent markets should be limited to the procurement of balancing gas.

Question 6 – Do you agree that the use of the expression 'economic and efficient' is a suitable criterion assessing TSO Balancing Actions? If not, please provide an alternative and an associated rationale.

Response:

BDEW and VKU agree with the mentioned expressions but wants to remark that also the technical framework should be taken into consideration.

Question 7 – Do you agree with the choices in the Draft Code: (1) to limit standardised products for trading flexible gas to short-term products; and (2) to have only a small number of short-term standardised products? If not, please explain why.

Response:

BDEW and VKU agree with a standardisation and limitation of short term products. As mentioned in our Position Paper for the ACER Pilot Framework Guideline, standardisation of balancing products allows for comparability and trading on different platforms and thus enhances the functioning of the market.

Question 8 – Do you agree that the Balancing Network Code should not prescribe exchange-based trading for the TSO and to leave this to the discretion of the TSO and the TPO? Should the network code provide criteria and factors to consider for the TSO to use an exchange based trading?

Response:

It should be left to the discretion of the TSO whether to use exchange based trading (if it exists) or not. The important requirement is that TSOs procure the required flexible gas at the lowest cost and limit the use of Locational and Temporal products as far as possible to avoid restricting the number of potential suppliers unnecessarily.

Question 9 – Do you agree with the current level of services to be provided by a Trading Platform specified in the Draft Code? For example, the STSPs make no reference to a block size, meaning that this will be agreed on a local basis. If not, please explain where and why additional specification is needed.

Response:

BDEW and VKU like to emphasize that the products which are to be traded at the TP should enable as many trading participants as possible to make offers on the platform. Therefore the size of the products should enable also smaller market participants to trade.

Question 10 – Do you agree with the current level of specification in the Draft Code on contractual structure and arrangements between the different parties? What changes (if any) would you advocate?

Response:

BDEW and VKU agree with the current level of specification.

Question 11 – Do you agree with the choices in the Draft Code to put the obligation to (re)nominate on the Originating Party? If not, what would your preferred alternative be and what benefits would this alternative have over the mechanism proposed in the Draft Code?

Response:

n.n.

Question 12 – Do you concur with the sequence of the tools in the merit order and the level of guidance it gives the TSO in choosing the most appropriate tool? If not, which changes, if any, would you advocate and why?

Response:

BDEW and VKU support a transparent merit order on the basis of which balancing products are used based on principles of cost efficiency. However there should be two things in the focus: the priority of selling short term products as well as the most economic and efficient products.

Question 13 – What is your view on: (1) the criteria to be considered by the TSO when procuring Balancing Services; and (2) the gradual reduction of the use of Balancing Services as the liquidity of the wholesale market increases? Please provide a reasoned response.

Response:

BDEW and VKU agree that some specific balancing services might be required depending on the extent of market development and grid characteristics e.g. access to flexible supply sources and offtakes for within hour/day balancing needs. On a market in transition the amount of standardized products offered might not be sufficient to address the balancing needs. Hence, additional balancing service substituting standardized products, e.g. flow commitments might be required. Nevertheless, the process adopted by the TSO to quantify its needs for specific balancing services should be transparent and the outcome of the analysis should be published. Where specific balancing services are needed they should be purchased by the TSO on a market basis.

Question 14 – Do you agree with the proposal that the TSO shall be enabled to submit an incentive mechanism to the NRA for approval? If not, please explain why.

Response:

BDEW and VKU agree with the proposal that the TSO shall be enabled to submit an incentive mechanism.. The incentive mechanism should be subject to consultation with shippers and be submitted to the NRA for approval.

Question 15 – Do you consider that the procedures set out in the Draft Code (excluding timing, which is covered below) for the submission of nominations and re-nominations, and the criteria for their rejection, are reasonable? If no, please present and justify your preferred alternative.

Response:

BDEW and VKU want to emphasize some unclear topics:

- The provisions under Art. 23 (1) i c) are unclear. The suggestion is that the TSO should inform shippers about nominations that exceed the booked capacity but should not automatically reject the nomination. Of course, interruption notices may have to be submitted if the sum of all nominations exceeds the available transport capacity at the interconnection point. Art. 23 (1) ii a) seems to be unclear as well.
- The provisions of Art. 23 (2) refers to the Shippers inputs and offtakes from a physical grid. This does not take into account that transactions at the VP need to be considered as well. In case TSOs cannot balance the system they should ask the shippers to renominate or curtail entries/exits. However the TSO should not get the authority to decide on shippers' renominations.

CHAPTER V. NOMINATIONS

Question 16 – Do you agree with the schedule for initial day-ahead nominations set out in the Draft Code? If not, please give a reasoned alternative schedule.

Response:

BDEW and VKU agree with the schedule for initial day-ahead nomination on 2pm CET, as it is in-line with current practice.

Question 17 – Do you agree with the schedule for re-nominations set out in the Draft Code? If not, please give a reasoned alternative schedule.

Response:

BDEW and VKU agree with renominations with 2 hours lead time, however it is not clear why renominations are only allowed after the Confirmation Deadline (i.e. 4pm CET) has passed. Renominations should be allowed immediately after the Nomination deadline. The TSO should use all renominations received between 2pm and 4pm for the first renomination cycle starting 4 pm. To meet the target of the EU energy roadmap, a closer connection of the gas and electricity market is necessary. This could require changes in the timeframe.

Question 18 – What are your initial views on these specific features on nominations (respectively re-nominations) for transition, system integrity and daily-hourly regimes of the network code? Please provide a reasoned response.

Response:

As mentioned in the answer to Q2: the proposed timeline for the termination of interim measures no later than five (5) years after the coming into force of the Network Code is considered too long.

CHAPTER VI. DAILY IMBALANCE CHARGES

Question 19 - Do you support the Daily Imbalance Quantity determination proposed in the Draft Code? If not, please indicate your preferred approach and supply further rationale and evidence of the benefits of Daily Imbalance Quantities being derived on information based during the Gas Day?

Response:

BDEW and VKU support the described determination.

Question 20 – Do you have alternative views as to whether Locational and/or Temporal Market Products should feed into the derivation of the Weighted Average Price? If so what is your rationale for a different approach and what do you see as the benefits?

Response:

Locational and Temporal Market Products can be included in the calculation of the Weighted Average Price. Through the inclusion of the locational and temporal products in the calculation of the weighted average price it is ensured that even in those cases, where temporal or locational products would set the highest or lowest price the resulting marginal sell/buy prices would allow the TSOs to recover its balancing costs.

In cases where a locational or temporal product sets the respective lowest or highest price than this price should not be used for the definition of the Marginal Sell or Buy Price. Excluding locational and temporal products from the determination of the highest or lowest price should avoid a situation where a comparable small volume at a specific location or at a specific time which can only be procured with a high premium/demium to the VP market price would set the price for the Daily Imbalance Charge.

Question 21 – Do you agree that day-ahead trades should feed into the determination of the Weighted Average Price, Marginal Buy Price and Marginal Sell Price? If so, then under what circumstances should they be used? Is there merit in allowing local discretion as to whether day-ahead trades influence the setting of the prices?

Response:

As a general rule all trades entered into by the TSO for balancing purposes should be included in the calculation of the weighted average prices. BDEW und VKU can't see a reason why day-ahead prices should be excluded.

Question 22 – Do you agree that the source of trades should be left to local discretion? What criteria should apply? Should there be an aspiration that the source of trades should be a single platform and if so why and how should the platform be determined? Please provide a rationale for your preferences.

Response:

In general the TSO should procure its flexible gas on the spot market, preferably within-day, for transparency reasons and to encourage the development of within-day liquidity whenever this is possible. As said earlier, a balancing platform for flexible gas (internet portal) may be necessary to procure locational and/or temporal products. The TSO should be able to prove to the NRA that procurement of flexible gas through the portal or other balancing services (e.g. min flow obligation) was necessary. This balancing platform should be compatible and/or harmonised with existing trading platforms.

Question 23 – What should the effect of the small adjustment be: to encourage trading or to be sufficiently large to reflect a value for physical flexibility?

Response:

The “small adjustment” should set incentives for the shipper to balance its portfolio. It should prevent situations in which the purchase of balancing energy from the TSO becomes the most attractive supply option for the shipper. Thereby the “small adjustment” also indirectly reflects the value of physical flexibility as every shipper would have to pay a price higher than the hub price for a fully flexible product to balance its portfolio.

However there is no definition what “small” means in this context. The adjustment should not be higher than for the purpose needed. Additional revenues for the TSO should be avoided.

Question 24 – Do you agree with the addition of cross border trade as a criterion to the derivation of the Small Adjustment? Are the criteria sufficient? If not, what else should be added? Please justify any proposals.

Response:

It is unclear, what is meant by the impact of the small adjustment on cross-border trade (see support document page 47).

If the TSO does not undertake any balancing actions, the small adjustment has to be sufficient to still provide an incentive for the shippers to balance their portfolios.

CHAPTER VII. WITHIN-DAY OBLIGATIONS

Question 25 – In your view, are the elaborations of the criteria in the Draft Code sufficient? If not, please indicate which ones and how.

Response:

BDEW and VKU agree, very extensive provisions are made about how WDOs are proposed by TSOs and how these proposals have to be reviewed by the NRAs. However the following general statements should be made:

1. WDOs should be minimized
2. WDOs should be harmonized as far as possible
3. WDOs should not undermine or contradict daily balancing regimes

Within-day obligations relating to the network users' inputs and off-takes could be necessary to ensure system integrity and should be a part of the balancing regime. Thereby, the network user can be incentivised to take appropriate balancing actions within the balancing period. They may also contribute to avoid large balancing costs that would otherwise be produced and socialized to all shippers. However, these within-day obligations must not create market entry barriers for new entrants. The within-day obligation should be harmonized European-wide as far as possible to avoid arbitrage.

However, when WDO are implemented, additional information for the shipper about their balancing status is needed. TSOs shall provide this information before a potential within-day charge is imposed. He shall provide it in a timely manner to enable Network Users to adjust their inputs and/or offtakes before a potential charge is imposed.

Question 26 – Do you believe that additional criteria for assessing WDOs are warranted? If yes, please specify which and why.

Response:

n.n.

Question 27 – Do you find the respective roles of a TSO and relevant NRA(s) appropriate in the approval of any WDOs? If not, please explain why and how you would re-define the roles.

Response:

Any consultation concerning WDO should be initiated by NRAs and the consultation process should involve all market participants.

Question 28 – Do you agree that a six-month period is appropriate for a TSO to make a proposal for approval of an existing WDO, including a recommendation document? If not, please propose an alternative and provide justification.

Response:

For BDEW and VKU the period of six months seem to be appropriate but a buffer of three additional months for complex cases where the period is too short should be granted.

Question 29 – Do you agree that a six-month period is appropriate for the NRA to conduct its assessment and approval process? If not, please propose an alternative and provide justification.

Response:

BDEW and VKU agree with the 6 month period.

Any assessments required should be published with a 6 month implementation time and it should be implemented at the beginning of the gas year, i.e. on the 1st of October.

CHAPTER VIII. NEUTRALITY ARRANGEMENTS

Question 30 – In your view, is the scope of the currently proposed neutrality section of the Draft Code appropriate? If not, please explain why.

Response:

Neutrality charges should be minimised.

A high degree of transparency should be used to define which costs should be part of the neutrality pot. The approach to determine costs based on a prognosis should be implemented as one option into the network code. The reasonable period for this option should be fixed at six months.

Therefore BDEW and VKU find the chapter not specific enough, more provisions are required e.g.:

- What is the relevant accounting period?
- What are the “concerned Network Users” (Art. 38 [1])?
- How is the use of the network by the Network User defined? Art. 37 (2) talks about entry and exit points but omits activities at the virtual point. It is important that shippers that are only active at the virtual point also share in the payment or receiving of Balancing Neutrality Charges
- What is the Balancing Neutrality Charge based on (transportation capacity, entry or exit, volumes delivered)?

BDEW and VKU are concerned, that the whole chapter is so openly defined that it allows all different system to comply with the rules. Therefore BDEW and VKU believe that on a longer term basis, stakeholders should agree on one balancing system which would enable more harmonization in Europe.

Question 31 – Do you find appropriate the proposed scope of the transparency elements of neutrality? If not, please explain your reasons why.

Response:

It is important that the Network User is able to calculate potential costs/revenues from the neutrality arrangement accurately enough to be reflected in its marketing decisions. Retroactive pricing should be avoided as far as possible. The German approach to fix the neutrality charge in advance with an adjustment every 6 months may serve as an example.

Question 32 – Please indicate the level of granularity you would expect in the context of the breakdown of net Balancing Neutrality Charges cash-flows from both a temporal (e.g. daily, monthly, annual) and cost/revenue element split.

Response:

An aggregate daily breakdown of some elements of the balancing neutrality costs (e.g. TSO Balancing Actions, Imbalance Charges, Within Day Charges (if any) and TSO use of Balancing Services etc) should be reported on at least a quarterly basis..

Question 33 – Do you agree that there would be potential benefits of attributing Balancing Neutrality Charges to different pots and of recovering them over different classes of network users? If yes, please explain why.

Response:

BDEW and VKU do not see any benefit of attributing Balancing Neutrality Charges to different pots and of recovering them over different classes of network users. The main objective should be to avoid any charges and additional costs for the network user and allocate the remaining costs in a nondiscriminatory manner.

Question 34 – If you support multiple neutrality pots, how would these be defined? How could such different attribution processes be applied in practice?

Response:

n.n.

Question 35 – Is the level of specification in the Draft Code for cash-flow management appropriate? If not, how do you propose it be amended?

Response:

BDEW and VKU agree with the level of specification.

Question 36 – An alternative to creating additional costs for invoicing systems and processes is to address neutrality sums via adjustment to transmission charges. Do you agree with such an alternative? If not, please explain why.

Response:

BDEW and VKU do not agree with the proposed alternative. Costs/revenues from balancing activities are not related to transportation capacities but to portfolio balancing activities of the shippers. Therefore the neutrality sums shall be shared based on the actual gas flows and imbalances of the shippers and not on the transportation capacity holding.

BDEW and VKU like to emphasize that in the German Balancing system transmission activities and portfolio balancing activities are part of different market roles. As the BKV is responsible for the portfolio balancing activities, the transmission activities are the responsibility of the shipper. Therefore neutrality sums shall be shared based on the allocations of the shippers.

Question 37 – Do you agree with the information provision models for offtakes proposed in the Draft Code fulfil the requirements of the FGs? If not, please explain.

Response:

As mentioned in the statement for the FG, TSOs should provide information in appropriate intervals, meaning at least twice a day on the individual shipper inputs and offtakes where needed as well as on the expected usage of flexible gas.

In general, status information is essential for market functioning. In order to be able to manage their balance position efficiently e.g. in making decisions on how to re-nominate within day, shippers need user friendly access to information on their own detailed balancing status including metering

and allocation data etc. Interactions with transparency guidelines are to be considered. BDEW and VKU see the need for additional information, such as information about intraday balancing status, if WDO will be implemented. That means in case within-day obligations are applied, there might be a need for additional and more frequent information on offtakes (and inputs) to be provided to network users.

Furthermore BDEW and VKU would like to emphasize that the additional costs necessary for the information provision – as for example the installation of new meters, connection of the meter to the electricity grid and the implementation of data management systems and telecommunication costs have to be included into relevant tariffs.

CHAPTER IX. INFORMATION PROVISION OBLIGATIONS

General remark:

It is important that the special role of the DSOs is acknowledged in the network code. Especially the rules laid out in this guideline regarding the information obligations will have a considerable impact on the DSOs' information and metering systems, as they have to deliver the majority of the data to the TSO. In the process TSO should consult stakeholders, in cooperation with the relevant DSOs where there are affected.

BDEW and VKU would like to add, that there should be an incentive for the TSO and DSO to make sure that the data quality of the information flows is subjected to an improvement process and should be as good as possible. Any model that is based on forecasting should provide these incentives because the shipper has to rely on the quality to avoid imbalances based on insufficient data.

Question 38 – Do you agree that prospective implementations of Variant 2 should be approved only after a consultation process? If not, please explain.

Response:

Base case, Variant 1 and 2 should be treated equal and the consultation process should be limited on the implementation of new models.

Question 39 – Do you support the additional proposal that the cost-benefit analysis (CBA) should also examine the time taken to provide information to Network Users? Are there any other features that would strengthen the CBA process and why? If so, please explain why.

Response:

BDEW and VKU support such a cost-benefit analysis.

However BDEW and VKU would like to point out that, depending on the national market model the costs and benefits of a faster and more frequent information provision are not shared by the same market role and sometimes not by the same company. Balancing information is important for the shipper, metering costs are usually paid by the suppliers. This has to be taken into account of the CBA. Regarding the granularity of the data provided, it should be taken into account that aggregated information on portfolios and metering information of individual customers have different purposes in the market models and should not be mingled together.

Question 40 – Do you agree that the Balancing Network Code has to provide guidance on timing of information flows? If yes, do you agree with the proposals set out? If you do not agree with the Draft Code proposals what could the alternatives be and what would be the justification?

Response:

On the one hand any harmonization reduces complexity and would help shippers in multiple balancing zones to manage their portfolios. However, regimes-with different WDO will require different amounts and timing of information. As long as basic principles like the balancing regime are not harmonized, a total harmonization of the timing of information flows seems to be disproportionate. Focus has to be put on the general principle laid out in the FG that the information given, shall put the shipper in a position enabling him to balancing his portfolio according to the balancing regime.

Question 41 – Do you consider that Transparency Guidelines requirements are sufficient to deal with system information? If not what should be included and what is the justification?

Response:

For a future approach the system information should be published in an aggregated and evaluated form on a single platform, therefore the shippers can keep track of the system status.

Question 42 – Do you agree that the proposal is in line with input information requirements set out in the FGs?

Response:

BDEW and VKU agree that the proposal is in line with input information requirements set out in the FG. However BDEW and VKU like to refer on answer to question 37 that additional information for the shipper might be needed, if new WDO will be implemented.

CHAPTER X. LINEPACK FLEXIBILITY SERVICE

Question 43 – Do the proposed additional criteria that a Linepack Flexibility Service has to meet complement those in the FGs to make a sufficient set of criteria? Or are additional criteria required? Please provide a reasoned response.

Response:

The most important conditions in Art. 47 are those under lit. e and lit. g.. The set of conditions in this article suggest that the TSO has spare line pack left after all balancing activities - even those necessary to avoid WDO – have been addressed. Under such circumstances not selling linepack would mean that the linepack is not used at all which is a sub-optimal solution. However, it is questionable whether these conditions can ever be met in practice:

1. Art 47 (1) lit e: linepack can always be used for within day balancing of the system. Therefore taking linepack away from the TSO and giving it to the shipper will ceteris paribus always increase the need for WDO, unless there are no WDOs in the first place.
2. Art 47 (1) lit g: If linepack is allocated to the shippers either through explicit sales or tolerances the TSO has to run its system within stricter operational limits. This ceteris paribus leads to more balancing activities.

Another general question to be addressed is whether the available excess linepack should be sold separately or used to grant imbalance tolerances to all shippers? Tolerances may be easier to administer but could reduce the need for within day information to be provided by the TSO on shippers' balancing status. Selling of linepack would on the other hand ensure that the available flexibility is allocated to the shippers with the highest need and the highest willingness to pay.

CHAPTER XI. IMPLEMENTATION, INTERIM MEASURES AND ENTRY INTO FORCE

Question 44 – How should the short-term balancing market be defined? What account of temporal and physical flow considerations needs to be made? What measures should be used to assess liquidity in the short-term balancing markets?

Response:

n.n.

Question 45 – What other measures might be contemplated to enable wider access to short term gas flexibility? Are any of these approaches appropriate for inclusion in the Balancing Network Code?

Response:

n.n.

Question 46 – In your view, what would justify including LNG in the Balancing Zone in “small markets” and in short term transitional arrangements? Do you see any conflict with these reasons and the BTM to be established by the eventual Balancing Network Code?

Response:

BDEW and VKU do not understand the question.

Question 47 – Do you agree that the tolerance used should be a price based tolerance? If not please explain your rationale and provide your preferred approach.

Response:

n.n.

Question 48 – In your view, should the reduced exposure involve the application of an average price? If not, please explain your rationale and provide your preferred approach.

Response:

n.n.

Question 49 – Do you support the Draft Code including provisions for the accuracy of forecast information provision to ensure timely phase-out of tolerances? If yes, explain how this can be best established.

Response:

n.n.

Question 50 – Does the Draft Code provide an appropriate mitigation of risk involved in servicing NDM demand? If not, please indicate an alternative approach and its rationale.

Response:

From the BDEW and VKU perspective the day-ahead forecast system as defined in Variant 2 is an appropriate measure at this point in time to reduce the risk in servicing NDM demand.

Question 51 – Do you agree that the Draft Code provides an adequate basis to support the release of surplus TSO flexibility as a stimulus to the market? If not, please explain why.

Response:

n.n.

Question 52 – Do you agree that there is merit in including a reference to Balancing Platform trades in the interim imbalance cash-out price determination part, as suggested in the Draft Code? If yes, how should the approach be formulated and what merits would it have?

Response:

BDEW and VKU agree. Balancing platform trades could provide a better reflection of the costs of keeping the system in balance in the interim than a proxy or administered price.

Question 53 – Are there any other interim steps that should be considered beyond those envisaged in the table above?

Response:

From the BDEW and VKU perspective no further interim steps are needed.

Question 54 – Are there any specific ENTSG monitoring and reporting activities that should be explicitly captured in the Balancing Network Code. If so, please identify them and their rationale.

Response:

n.n.

GENERAL ISSUES

Question 55 – Do you consider that the level of detail in the Draft Code, as it has been tailored according to the topics treated, is appropriate for EU legislation? If not, please explain why with reference to specific topic chapters (articles, paragraphs, etc.).

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Question 56 – After reviewing and/or replying to Chapter 5 which follow, do you find that there are other material issues that ENTSG should consider as it develops the Balancing Network Code?

Response:

No.

Question 57 – Do you find that this supporting document for the public consultation was ‘respondent-friendly’ in terms of its readability, style, etc.? Please explain how we can improve future consultations.

Response:

The supporting document was helpful to understand the decision process for the draft code.

