

ENTSO conference centre (ground floor), 100 Av. de Cortenbergh, B-1000 Brussels, Belgium

AGENDA

Please note all sections (other than the Welcome) will allow time for open discussion

No.	Description	Presenter	Time
	Registration and pre-workshop coffee		from 10:00
0.	ENTSOG welcome	N. Sisman, ENTSOG	10:30-10:35
1.	Public consultation <ul style="list-style-type: none"> • Response analysis • Issue identification and resolution 	T. Gerus, ENTSOG	10:35-11:00
2.	Initial ACER reaction to Draft Code <ul style="list-style-type: none"> • Clarifications and initial questions 	K. Keyserlingk, ACER	11:00-11:30
3.	Content issue analysis and preliminary views <ul style="list-style-type: none"> • Chapter II. Balancing System • Chapter III. Cross-border Cooperation • Chapter IV. Operational Balancing; Release of Flexible Gas (as interim measure) 	R. van der Meer, ENTSOG Markus Sammut, NetConnect Germany	11:30-12:45
	Lunch		12:45-13:30
4.	Content issue analysis and preliminary views <ul style="list-style-type: none"> • Chapter V. Nominations • Chapter VII. Daily Imbalance Charges; Tolerances (as interim measure) • Chapter VIII. Neutrality Arrangements • Chapter IX. Information Provision • Chapter X. Linepack Flexibility Service 	Noel Regan, ENTSOG Julien Quainon, GRTgaz Markus Sammut, NetConnect Germany	13:30-15:15
	Coffee break		15:15-15:30
5.	Content issue analysis and preliminary views <ul style="list-style-type: none"> • Chapter VI. Within-day obligations 	R. van der Meer, ENTSOG	15:30-16:00
6.	Next steps <ul style="list-style-type: none"> • Analysis of Decision document • Timeline to Refined Code delivery 	T. Gerus, ENTSOG	16:00-16:15
7.	Conclusions	N. Sisman, ENTSOG	16:15-16:30



fair partner to all



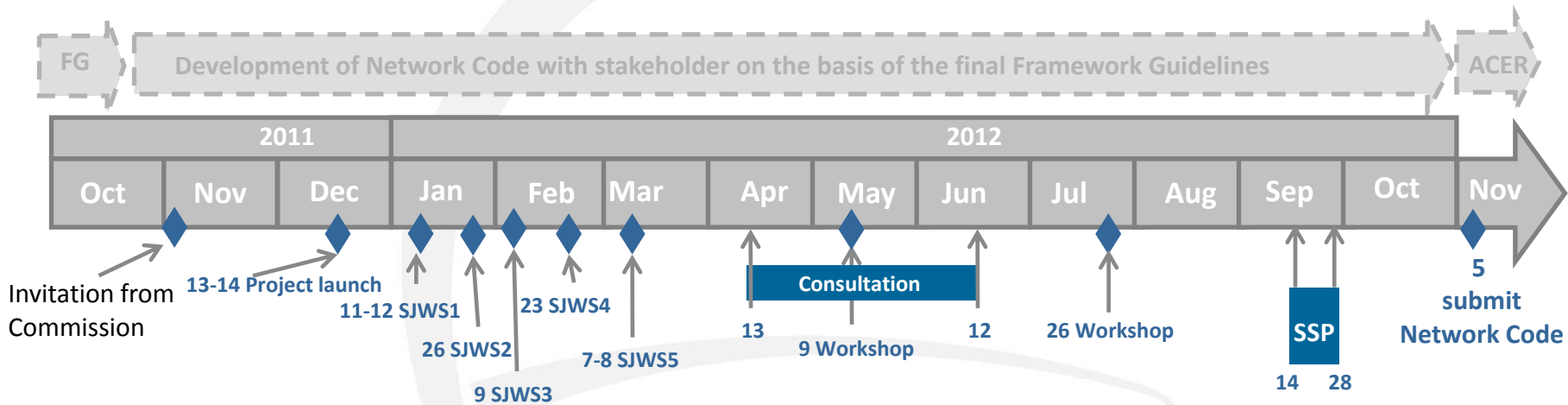
Report on public consultation on Draft Code on Balancing

Refinement Workshop

Tori Gerus
Adviser

Brussels - 26 July 2012

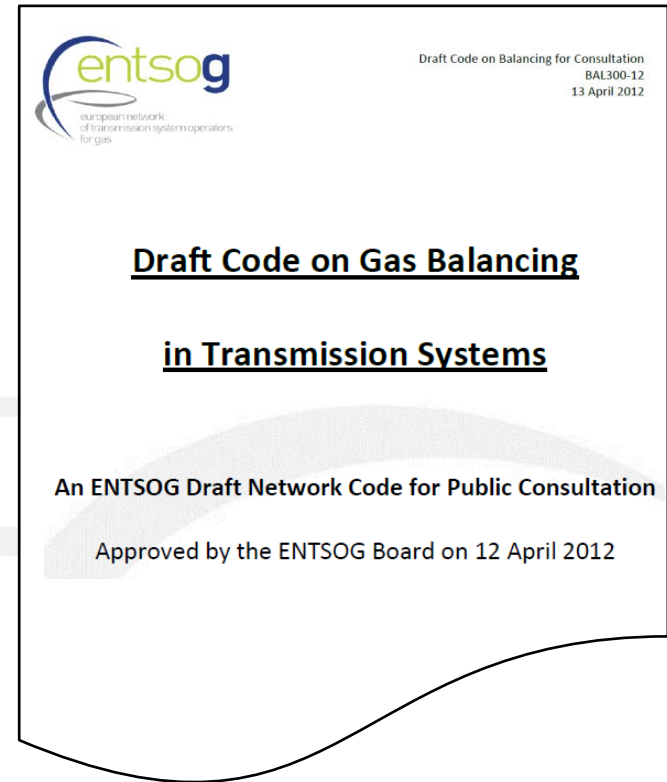
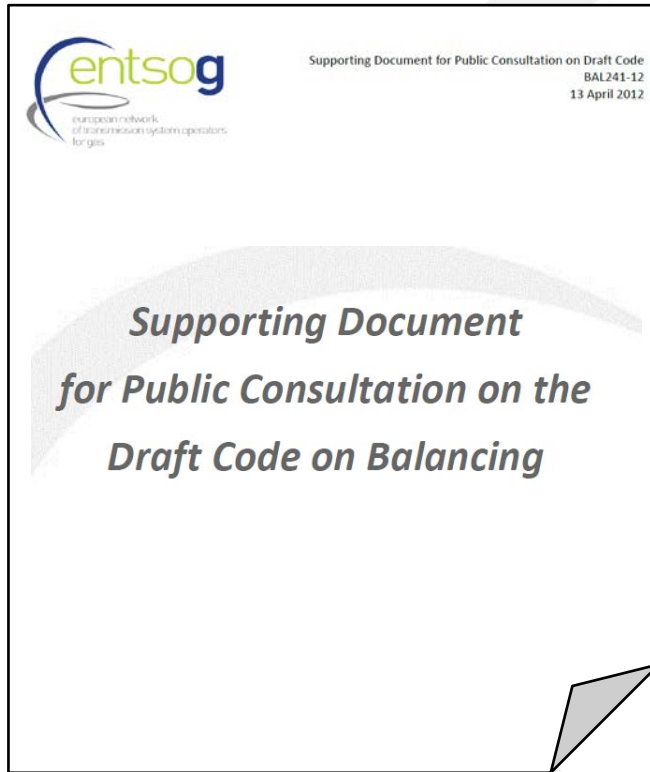
BAL NC refinement phase: 13 June - 4 Nov.



Main phases of activities of ENTSOG and stakeholders in BAL NC process

ENTSOG	Development of launch documentation	Development of draft network code in cooperation with stakeholders	Refinement of network code based on the feedback by stakeholders
Stakeholder		SJWS SJWS SJWS SJWS SJWS	Feedback on drafted Network Code by ENTSOG Workshop SSP

Public Consultation: 13 Apr - 12 June 2012



Responses by Type of stakeholder



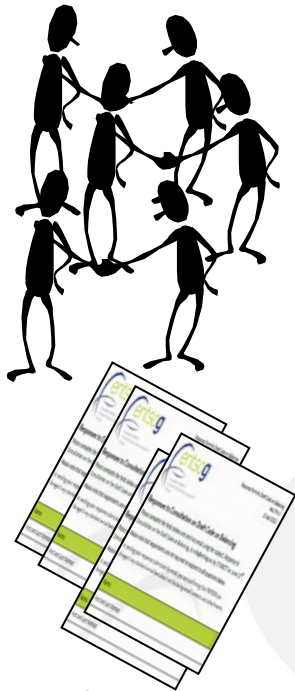
Overall responses received	51	
European associations	9	18%
National associations*	8	16%
Network users and others	33	65%
National regulators (independent of ACER)	1	2%
* Member states = France, Italy, the Netherlands, Spain, UK		

Response count by chapter and question

Chapter		Q#	No. of responses	Chapter		Q#	No. of responses		
II	BALANCING SYSTEM	1	38	VIII	NEUTRALITY ARRANGEMENTS	30	38		
		2	37			31	34		
III	CROSS-BORDER COOPERATION	3	38			32	33		
		4	41			33	36		
IV	OPERATIONAL BALANCING	5	39			34	26		
		6	38			35	30		
		7	41			36	34		
		8	40			IX	INFORMATION PROVISION	37	36
		9	36					38	40
		10	36					39	42
		11	30	40	38				
		12	40	41	36				
		13	39	42	38				
		14	37	X	LINEPACK FLEXIBILITY SERVICE			43	35
V	NOMINATIONS	15	37					XI	IMPLEMENTATION, INTERIM MEASURES
		16	36	45	25				
		17	37	46	30				
		18	36	47	30				
VI	DAILY IMBALANCE CHARGES	19	38	48	26				
		20	40	49	31				
		21	40	50	28				
		22	36	51	27				
		23	41	52	28				
		24	35	53	31				
VII	WITHIN-DAY OBLIGATIONS	25	40	54	28				
		26	34	--	GENERAL ISSUES	55	20		
		27	36			56	26		
		28	34			57	37		
		29	35						

FROM responses TO question files ILLUSTRATIVE

Project team members +
WG volunteers (see below)



Member/WG member volunteers

- Stephan Alaerds, NetConnect Germany
- Sandrie Egberts, GTS
- Lorenzo Nicolosi, SNAM
- Julien Quainon, GRTGaz
- Chris Shanley, National Grid
- José Vega Aguado, Enagas
- Stefan Wacholz, Thyssengas

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 rules in the Balancing Network Code will contribute to the delivery of a properly functioning market? If not, please propose an alternative and provide justification.

Stakeholder: AFG (French Gas Assoc.)

Response: Yes

Stakeholder: ANIGAS

Response: None

Stakeholder: BBL Company

Response: None

Stakeholder: BP Gas Marketing

Response: Yes. A virtual trading point is a vital component of any balancing regime.

Stakeholder: CEDEC

Response: None

Stakeholder: Centrica Plc

Response: Yes. This is essential for the development of a properly functioning market

Stakeholder: DEPA S.A.

Response: If 'harmonisation' refers to a strong dependence of allocations on nominations and specifically the equality of quantities nominated and allocated, we strongly agree, on grounds of (a) nominating parties actually needing the nominated quantities without deviation, (b) any deviation actually arising in practice after allocation needing to be visible and be charged for as an imbalance.

Stakeholder: Direct Energie

Response: Direct Energie agrees

Stakeholder: EconGas

Response: In markets without existing entry/exit system some kind of trading mechanism is needed to fulfil the obligations of the NC BAL. The questions remains if such a system is needed in markets with an already established VTP in which such a Trade Notification system seems only as an additional burden for the shippers without any advantage.

FROM question files TO common themes

ILLUSTRATIVE

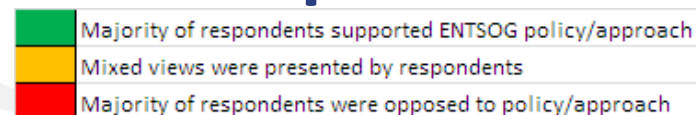
<p>Question: 47 Do you agree that the tolerance used should be a price based tolerance ? If not please explain your rationale and provide your preferred approach</p>	
No of respondents	30
In favour	Most
Opposition	<p>EDP Group : tolerance levels should not be considerate in the imbalance quantity and it should not be cashed out</p> <p>Energie Nederlands : no tolerances at all</p> <p>GasTerra: local discretion, i.e., no harmonisation</p> <p>Direct Energie : favour carry-over tolerances (as it exists in France for a part of the imbalance)</p>
Alternatives	<p>Eurogas : Tolerances based on :</p> <ul style="list-style-type: none"> - Quality of available information, degree of availability of sources of flexible gas and composition of the user's portfolio <p>Price same one reconciliation one; Tolerances as on oblation when lack of short term liquid market or flexible gas</p>
Positions and Rationale	<p>Theme 1: price-based tolerances as an interim step Respondents: BP, EFET, Poweo, PGNiG, others Describe theme: tolerances can't apply when information (and flexible gas in some responses) is ok Rationale for arguments:</p> <ul style="list-style-type: none"> - interim step but not the target - NUs should be settled based on WAP for the day when imbalance occurred (with certain tolerance). The level of tolerance must be linked to the quality of information on network flows, provided by the TSO. If the quality of the data transmitted deteriorates, the level of tolerance must be increased. <p>Evidence provided yes/no: NO</p> <p>Theme 2: obligation to offer tolerances Respondents: 1 (Vattenfall) Describe issue: if there is no flexible gas or liquidity, or a lack of info, tolerances have to (and not may) be offered Rationale for arguments: no way to know the imbalance or no remedy Evidence provided yes/no: NO</p> <p>Theme3: carry-over tolerances Respondents: 1 (Direct Energie) Describe issue: Direct Energie would prefer a system with carry-over tolerances, which is to cost-efficient. If tolerances are price based, the tolerance should take into account the difference between NDM forecast and NDM allocation. Rationale for arguments: competition for small users Evidence provided yes/no: cost-efficiency</p>

FROM common themes TO issues

ILLUSTRATIVE

Ref	Topic	Title	Comments	Issue Status	Priority	NC changes foreseen
Count= 79						
1	Nominations	harmonization of daily and hourly nomination at IPs	View Entries...	Resolved	(3) Low	No
2	Nominations	Rejection of nomination due to physical constraint	View Entries...	Active	(2) Normal	Pending
3	Nominations	General issues Rejection of nomination and renomination	View Entries...	Resolved	(2) Normal	Yes
4	Nominations	Rejection of nomination for system integrity	View Entries...	Active	(2) Normal	Pending
5	Nominations	Nomination and re-nomination procedure at non-Interconnection Points	View Entries...	Resolved	(2) Normal	No
6	Nominations	Include CMP Provision in the NC	View Entries...	Resolved	(3) Low	No
7	Nominations	Default rule - lesser of for all IPs	View Entries...	Resolved	(2) Normal	No
8	Nominations	Why do TSOs have the option to seek further forecasts	View Entries...	Resolved	(3) Low	No
9	Nominations	Criteria for need for nominations at Non IPs and defn of technical flexibility	View Entries...	Resolved	(2) Normal	No
10	Nominations	Communication standards - such as Edigas	View Entries...	Resolved	(3) Low	No
11	Nominations	Informing the NRA of rejected nominations and reasons for it	View Entries...	Resolved	(2) Normal	No
12	Nominations	Code assumes a confirmation process which is not always true	View Entries...	Resolved	(3) Low	No
13	Nominations	Shorter Lead times for nominations / renominations and matching	View Entries...	KG Agreed	(2) Normal	No
14	Nominations	Include Nomination and confirmation deadline defn's in NC	View Entries...	Closed	(2) Normal	Pending
15	Nominations	DA Nomination should be linked to the timing of Allocation data	View Entries...	Resolved	(2) Normal	No
16	Information Provision	Timing - Provision of the first NDM Forecast	View Entries...	Resolved	(3) Low	No
17	Nominations	information about the NDM demand not provided before the Nomination Deadline	View Entries...	Resolved	(2) Normal	No
18	Nominations	Coordination with CAM NC - timing vs. auction timing	View Entries...	Active	(3) Low	Pending
19	Nominations	Aspiration for future lead time less than 2 hours	View Entries...	Resolved	(2) Normal	No
20	Nominations	2-hr window for renoms; should be shorter for WDO(s)	View Entries...	Resolved	(2) Normal	No
21	Nominations	TSO should process Renoms immediately after Nom Deadline (no 2hr freeze)	View Entries...	Resolved	(2) Normal	No

ENTSOG identified key issues in response



Chapter	Q#	Count	Position	Issues raised
II BALANCING SYSTEM				
VTP and Trade Notifications	1	38		8
Sufficient harmonisation	2	37		
III CROSS-BORDER COOPERATION				
Report on harmonisation progress	3	38		6
Report on CBC	4	41		
IV OPERATIONAL BALANCING				
TSO trading in adjacent markets	5	39		35
economic and efficient' criterion	6	38		
Short-term standardised products	7	41		
Exchanged-based trading and TPO	8	40		
Services provided on Trading Platform	9	36		
Contractual structure	10	36		
Originating Party obligation to (re)nominate	11	30		
Merit order	12	40		
Procurement of balancing services	13	39		
TSO-proposed incentive mechanisms	14	37		
V NOMINATIONS				
Reasonable noms procedures	15	37		29
Schedule for day-ahead noms	16	36		
Schedule for re-noms	17	37		
Specific features of nominations	18	36		
VI DAILY IMBALANCE CHARGES				
Quantity determination	19	38		9
Locational and Temporal Market Products	20	40		
Inclusion of day-ahead trades	21	40		
Source of trades	22	36		
Small adjustment	23	41		
Cross-border trade criterion	24	35		
VII WITHIN-DAY OBLIGATIONS				
Elaboration of criteria	25	40		33
Additional criteria needed	26	34		
TSO and NRA roles in approval	27	36		
6-mos process for TSO	28	34		
6-mos process for NRA	29	35		

Chapter	Q#	Count	Position	Issues raised
VIII NEUTRALITY ARRANGEMENTS				
Scope/depth of code proposals	30	38		14
Transparency	31	34		
Info. granularity	32	33		
Neutrality pots	33	36		
Neutrality pots in practice	34	26		
Cash-flow management	35	30		
	36	34		
IX INFORMATION PROVISION				
Info. for offtakes	37	36		15
Variant 2 requirements	38	40		
CBA and additional elements	39	42		
Harmonised info. flows	40	38		
Transparency Guidelines	41	36		
Input info. Requirements	42	38		
X LINEPACK FLEXIBILITY SERVICE				
LFS product reqs.	43	35		4
XI IMPLEMENTATION, INTERIM MEASURES				
Definition of short-term balancing market	44	27		25
Access to short-term gas flexibility	45	25		
LNG "small country" carve-out in FG	46	30		
Price-based tolerances	47	30		
Application of average price	48	26		
Forecast accuracy and tolerance phase-out	49	31		
Mitigating NDM demand risk	50	28		
Release of TSO surplus flexibility	51	27		
Ref. to balancing platform trades	52	28		
Additional interim measures	53	31		
ENTSOG monitoring activity	54	28		
-- GENERAL ISSUES				
Level of detail in code	55	20		4
Omitted material issues	56	26		
Supporting document	57	37		



Today's Approach

- ENTSOG intends to summarise the key issues from stakeholders
- Not all issues raised in consultation responses will be covered
- Indicate initial thinking with regard to Network Code
- For discussion purposes only – not a commitment on changes to Network Code at this stage

Thank You for Your Attention

Victoria Gerus
Adviser
ENTSOG
Avenue de Cortenbergh 100
B-1000 Brussels

EML: victoria.gerus@entsog.eu
WWW: www.entsog.eu





fair partner to all



Update on Capacity Allocation Mechanisms (CAM) Network Code

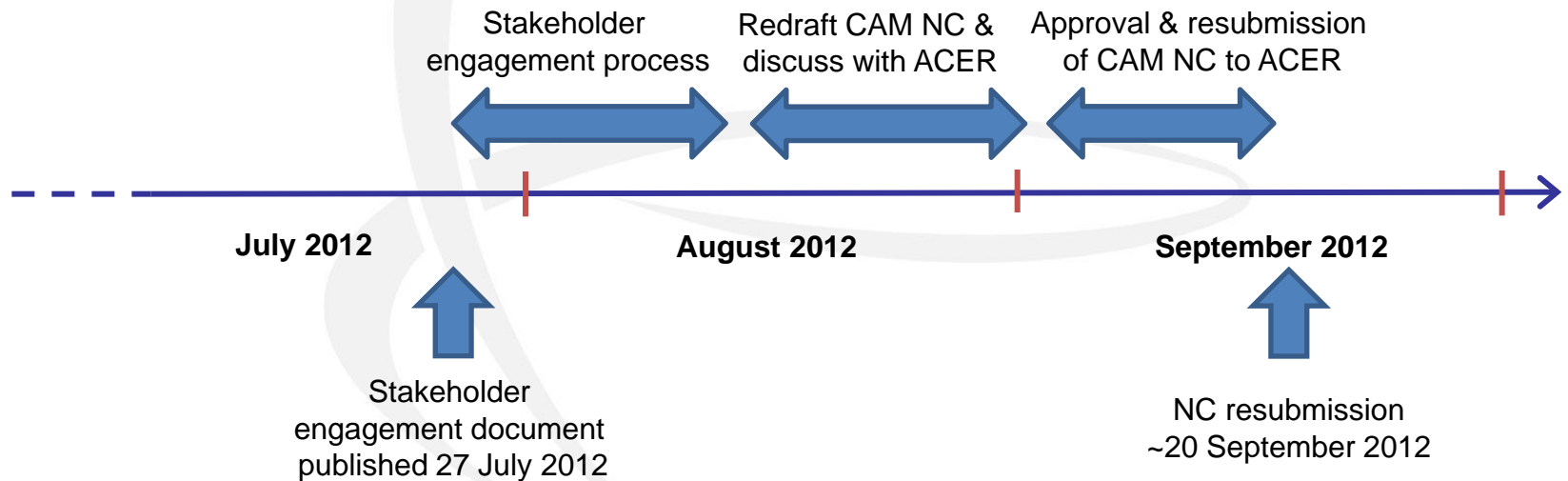
Brussels – 26 July 2012

Potential changes to the CAM NC

- ACER opinion delivered to ENTSOG on 5 June 2012
- Opinion recommends changes to the CAM NC in 11 areas: 4 are particularly significant from ENTSOG's point of view:
 - Application of capacity reservation quotas to new capacity
 - Increase in quotas for existing capacity
 - Restriction on offer of unbundled capacity, where technical capacities at both sides of an IP do not match
 - Removal of some specific provisions on tariffs
- ENTSOG will propose a compromise solution
 - Delivers what ACER has requested in most areas
 - Moves substantially toward ACER's position where possible in the remaining areas, while retaining certain essential protections
- ENTSOG also proposes some small technical changes to make the NC more workable
 - Mostly relating to timing of day ahead and within-day capacity allocation

Next steps on the CAM NC

- EC has formally asked ENTSOG to resubmit the modified CAM NC to ACER by mid-September 2012
 - ENTSOG will do everything possible to respect this timescale
 - Stakeholder engagement before resubmission is an essential step



- EC hopes to start comitology very early in 2013

Thank You for Your Attention

Heather Glass
Adviser
ENTSOG
Avenue de Cortenbergh 100
B-1000 Brussels


EML: heather.glass@entsog.eu
WWW: www.entsog.eu





fair partner to all

ACER

 Agency for the Cooperation
of Energy Regulators

ENTSOG's network code on gas balancing

Konrad Keyserlingk, Senior Manager,
Ofgem

ACER gas balancing TF chair

ENTSOG refinement workshop
26th July 2012

ACER's role

- ACER's statutory role on this project was primarily to draft the framework guideline and will be to provide a reasoned opinion within 3 months of the publication of the network code.
- Active ACER engagement throughout the network code development process is needed to ensure that ACER's comments can be considered within ENTSOG's timescales.
- ACER drafted an informal preliminary opinion, based on ENTSOG's code.
- Discussions with ENTSOG and the European Commission are ongoing.

Without prejudice to the Agency's reasoned opinion on the network code.

This is not ACER's reasoned opinion...

- ACER's reasoned opinion will be due 3 months after the network code has been submitted (5th February)
- ACER's reasoned opinion will assess whether the network code is in line with the framework guideline (Regulation 715 Article 6(7))

General comments

- ENTSOG's process has been Inclusive and transparent
- There have been regular and intensive discussions between ENTSOG, ACER and the European Commission
- There is a high degree of compliance of the network code with the framework guideline
- Some elements of the network code are not compliant with the framework guideline and need to be revised

Within-day obligations

- NC should better reflect the principles and criteria to be applied when determining whether within-day obligations can be introduced and what they should look like
- Network Code would benefit from a better definition of Within-day obligations
- Approval process needs to be amended as it is not in line with FG
- Analysis of how existing Within-day obligations relate to criteria is needed
- Within-day obligations must be accompanied by appropriate information provision

Operational balancing (“TSO procurement”)

- Merit order needs to be made stricter (“maximise the use of short-term standardised products”)
- Balancing services need to be defined
- Adjacent TSOs need to cooperate across borders when defining products beyond the standardisation in the network code
- Balancing platforms also need to comply with these principles

Neutrality

- Only efficiently incurred costs to be passed through
- Needs to allow for incentives
- Detailed harmonisation not needed

Nomination rules

- Interim step not justified
- Agree with focusing on interconnection points, but also need to look at requirements for domestic entry or exit points
- Consistency in timing with CMP, CAM, balancing information provision etc needs to be ensured
- Network code needs to provide some guidance for circumstances in which TSOs may reject nominations

Role for national regulators in approving aspects of the balancing regime

- Several sections of the framework guideline, require NRA approval to be inserted into the network code
(e.g. Within-day obligations, measures for cross-border cooperation, incentives, nomination rules, cash-out methodology, neutrality, information provision requirements, commercial linepack products, implementation, interim steps)
- Where the framework guideline foresees NRA approval, national administrative law applies
- NRAs need to be able to amend, reject and initiate proposals
- Legal basis for rules on NRA approval

Other

- Use of interim steps must be minimised
- “Small adjustment” to imbalance charges may need to be capped
- ENTSOG and ACER monitoring roles

THANK YOU FOR YOUR ATTENTION!



entsog

fair partner to all



european network
of transmission system operators
for gas

Operational Balancing

Refinement Workshop

Ruud van der Meer

Markus Sammut

Brussels - 26 July 2012

Operational balancing: Merit order – strengthen

C&G #: 81

Feedback received

- Stakeholders: Some did not support the wording, as they felt that the current wording would benefit from some changes to clarify the text. Some other respondents supported the concept but also felt some wording changes would be required.

Rationale and/or evidence

- Further clarity would make the meaning more obvious and tighten up the merit order.



Consider firming up the merit order in the Draft Code

Operational balancing: Balancing services in the merit order

C&G #: 6

Feedback received

- **Stakeholders:** Balancing services should only be used if STSP do not or are not likely to provide the required response.

Rationale and/or evidence

- Balancing Services should only be used as a last resort.
- A clearer prioritization between STSPs and balancing services are sought for.

propose to strengthen the merit order so the balancing services are only used when the Short Term Standardised Products are not expected to provide the required response

Potential refinements to merit order

.. when deciding upon the appropriate Balancing Actions to undertake, the TSO shall:

1. prioritise the use of Title Market Product where and to the extent appropriate over any other available Short Term Standardised Products
2. use Locational Market Products when, in order to keep the Transmission System within its operational limits, gas flow changes are needed at specific Entry and/or Exit Points and/or to start from a specific period of time within the Gas Day.
3. use Temporal Market Products when, in order to keep the Transmission System within its operational limits, gas flow changes are needed within a specific period of time within the Gas Day. The TSO shall only use a Temporal Market Product when in its discretion under defined circumstances it would be more efficient and economic than buying or selling of a combination of Title Market Product or Locational Market Product.
4. only use Balancing Services when Short Term Standardised Products would not upon assessment of the TSO's concerned provide the response necessary to keep the system within the operational limits.

Operational balancing: Originating party

C&G #: 53

Feedback received

- Stakeholders suggest to lift this detail from the NC and leave implementation details to local implementation.

Rationale and/or evidence

- The reasoning is that different (evolution of) markets need different solutions. Their suggestion is to replace “originating party” by “network user trading with TSO”.

Consider keeping the current wording in the Draft Code but to add option to identify the party that has to make the (re)nomination in the locational trade

Operational balancing: Exchange-based trading

Feedback received

- **Stakeholders:** Specific criteria and factors should be fulfilled by the TSO when using an exchange based trading platform.

Rationale and/or evidence

- The trading platform must provide sufficient support for the TSO in undertaking balancing actions. The network code should provide guidance on when sufficient support is provided.

G&C #s: 24,27,35

Consider amending the Draft Code and adding criteria for the use of TPs by the TSO.

Operational balancing: Balancing services criteria

C&G #: 92

Feedback received

- Stakeholders felt the criteria to be considered by the TSO when procuring balancing services were appropriate but a number of comments were made on the text/aspects of the criteria.

Rationale and/or evidence

- The text should clarify the distinction between the procurement and the use of balancing services

Consider amending the current wording in the Draft Code to better separate the procurement and use of balancing services.

Operational balancing: Market based procurement process


C&G #: 110

Feedback received

- Stakeholders argue that the criteria that the TSO has to consider when procuring balancing services are generally appropriate but stress that the procurement process should take place in a transparent and market based manner.

Rationale and/or evidence

- Transparent procurement service would help avoiding discrimination.



Consider refining the current wording in the Draft Code to reflect this feedback.

Operational balancing: Contracts for balancing services max 1 year

C&G #: 7

Feedback received

Rationale and/or evidence

- **Stakeholders:** The FG limit the contract duration of balancing services to 1 year. This should also be mentioned in the network code.
- The intention of limiting the contract duration of a balancing service to 1 year is to prevent the TSO to enter into commitments beyond the next year.

Propose refining the Draft Code in line with the above but will provide the TSO with the possibility to approach the NRA in specific circumstances for a longer duration.

Operational balancing: TSO trading in adjacent markets

C&G #: 8

Feedback received

- **Stakeholders:**
- The stakeholders were evenly split on whether the TSO should have the possibility to trade in adjacent markets.

Rationale and/or evidence

- Those who advocated for stated that it would:
 - Allow system to be kept in a safe position within operational limits
 - Avoid a monopoly situation
 - Be a viable interim solution
- Those who advocated against stated that it would:
 - Hinder development and liquidity in the TSOs own market
 - Divert flexibility away from shippers
 - Compromise the TSOs role as a residual balancer

Consider refining the code so that the NRA can approve the TSO trading in adjacent markets in certain circumstances and/or investigate perceived market failure

Operational balancing: Trading day-ahead

C&G #: 9

Feedback received

- **Stakeholders:** The merit order should specify that TSO should trade within-day and only where this does not provide the required response can the TSO use day-ahead or weekend trades.

Rationale and/or evidence

- This would give a clear priority of the usage of within-day products instead of day-ahead products.
- Balancing is an intra-day issue, so trading should also occur within-day to the extent possible.

Consider refining the Draft Code prioritising within-day products over day-ahead products to the extent appropriate.

Operational balancing: Incentives – inclusion of stakeholders in the text

C&G #: 95

Feedback received

Rationale and/or evidence

- Overall there is support for incentive schemes and the importance of the consultation process in ensuring relevant stakeholders can provide input. However, differing views have been made on who is best placed to design the incentive and/or initiate the proposal.
- Better inclusion of stakeholders in the text/process.

Consider amending the current wording in the Draft Code to reflect stakeholders position in the consultation process.



fair partner to all



european network
of transmission system operators
for gas

Balancing System

Refinement Workshop

Balancing systems: One virtual trading point


G&C #s:12

Feedback received

Stakeholders: Each balancing zone should have one and only one virtual trading point.

Rationale and/or evidence

- Allows pooling of liquidity
- Equal access for shippers
- Lower entry barriers and fosters competition



Consider this already to be a part of the Draft Code and has always been the objective in the process

Balancing systems: Default rule on trade notification

G&C #s:13

Feedback received

Stakeholders: Diverging views received on the default rule on trading notifications:

- Some stakeholders sought for a single matching procedure
- Other stakeholders preferred to have locally defined matching rule

Rationale and/or evidence

- Clear request for harmonising the default rule, but...
- This harmonisation comes with a cost and this cost does not justify changing existing default rules

Consider amending article 8.5 and limiting of the TSO to two default rules:

- *Lesser-of-rule and*
- *Reject the notifications-rule*

Balancing systems: Lead time trade notifications

C&G #: 14

Feedback received

- **Stakeholders:** No fundamental reason to link lead time for trade notifications to re-nomination deadlines. Lead time should be as short as possible and aligned on best practice..

Rationale and/or evidence

- The process for matching trade notification is easier than nomination processes and there is no operational consequences of a trade notification.
- The lead time can be shorter than the minimum lead time of two hours.
- As the process should be similar for most TSOs, the request to align with best practice is reasonable and supports harmonisation.

Consider amending Article 8.2 so the TSO shall make lead times for submitting (re)notifications as short as possible and aligned with best practice

Balancing systems: Add concept of single sided notifications

C&G #: 18

Feedback received

- **Stakeholders:** NC should support single sided notifications for exchange or corresponding clearing house.

Rationale and/or evidence

- The code should not prevent the TSO and a clearing house to agree on the use of single sided nominations. Single sided notifications can be necessary for exchanges/clearing houses to mitigate the risk of non-matching notifications.

Consider the Draft Code already allows for the TSO and the Clearing House to agree on a single sided trade notifications

Balancing systems: Bring daily and hourly trade notifications in line

C&G #: 16

Feedback received

- **Stakeholders:** Add daily quantity to hourly notifications and hourly quantity to daily notifications

Rationale and/or evidence

- Get a high level of harmonisation

ENTSOG does not expect to amend the Draft Code



european network
of transmission system operators
for gas

Cross Border Cooperation

Refinement Workshop

Cross-border cooperation: Review of the harmonisation of balancing rules

C&G #: 20

Feedback received

- **Stakeholders:** Review of harmonisation on an annual basis instead of only every second year

Rationale and/or evidence

- This could help speed up harmonisation

Look into a solution that will provide the possibility of reviewing the code more than every second year.

Cross-border cooperation: DSOs role in the consultation process

C&G #: 21

Feedback received

- **Stakeholders:** DSOs roles should be mentioned in the consultation process.

Rationale and/or evidence

- DSOs are significant stakeholders and will be affected by cross-border projects.

Propose not to amend the code. DSOs will continue to play a key role in stakeholder engagement process given their importance.

Cross-border cooperation: Involvement of ACER in ENTSOG review process

C&G #: 22

Feedback received

- **Stakeholders:** ENTSOG should involve ACER in the review process

Rationale and/or evidence

- For network users it is essential that any reviews concerning the operations of the FG and NC are being supervised and judged by an independent organisation.

do not propose to amend the code.

Cross-border cooperation: ENT SOGs role too heavy

C&G #: 23

Feedback received

- **Stakeholders:** ENT SOGs role could delay bilateral projects

Rationale and/or evidence

- ENT SOG should be informed of cross-border cooperation projects but it should be explicit that its intervention in the process could not delay it.

Role specified for ENT SOG in Chapter III is well balanced and shall not prevent TSOs from any bilateral cooperation



fair partner to all



european network
of transmission system operators
for gas

Daily Imbalance Charges

Daily Imbalance Charges

- Almost all Stakeholders agree with model for Daily Imbalance Charges
 - A Stakeholder favours an alternative Single Price Cash-out
- Stakeholder views on the specifics of this Chapter generally consistent

Imbalance Charge: basis of Daily Imbalance Quantity

Feedback received

Stakeholders: Small number of stakeholders seeking Daily Imbalance Quantity on final forecast and not initial Allocation

Stakeholders: Imbalance based on initial Allocation and not Final Allocation

Rationale and/or evidence

- Ability to manage risks of imbalance, given information provisions

not consider a code change given measures in place already to protect Network Users, avoid socialisation of costs, focus on NU role to balance

Imbalance Charge: timing of Allocation info.

Feedback received

Stakeholders: Some stakeholders seeking delivery of initial Allocation information after the Gas day rather than up-to 3 days (where needed for operational and technical reasons)
Accept interim measure may be needed

Rationale and/or evidence

- Supports Network Users in forecasting

Consider amending code so that after interim measures are expired, initial Allocation must be delivered on the following Gas Day

Imbalance Charge: design of Small Adjustment

Feedback received

Stakeholders: Many stakeholders seeking greater protection from “Small Adjustments” being punitive.

Several examples given:

- Link to cost of alternative flexible gas
- Link to Hub transaction cost (multiple off)
- Percentage of WAP as cap
- Ex-post pricing
- Marginal investment cost

Rationale and/or evidence

- Lack of harmonisation
- Exposure may be provide too great a risk – barrier to entry

Consider amending the code so that once the Balancing Target Model is reached a Small Adjustment cap of 10% of WAP will apply (carve out where justified & NRA approval).

Also Extra criteria “not impose excessive risk on Network Users”

Imbalance Charge: Inclusion of Locational and Temporal trades

Feedback received

Stakeholders: Almost unanimous view that that only title trades should be included and that trading in locational and temporal (L&T) products should be excluded

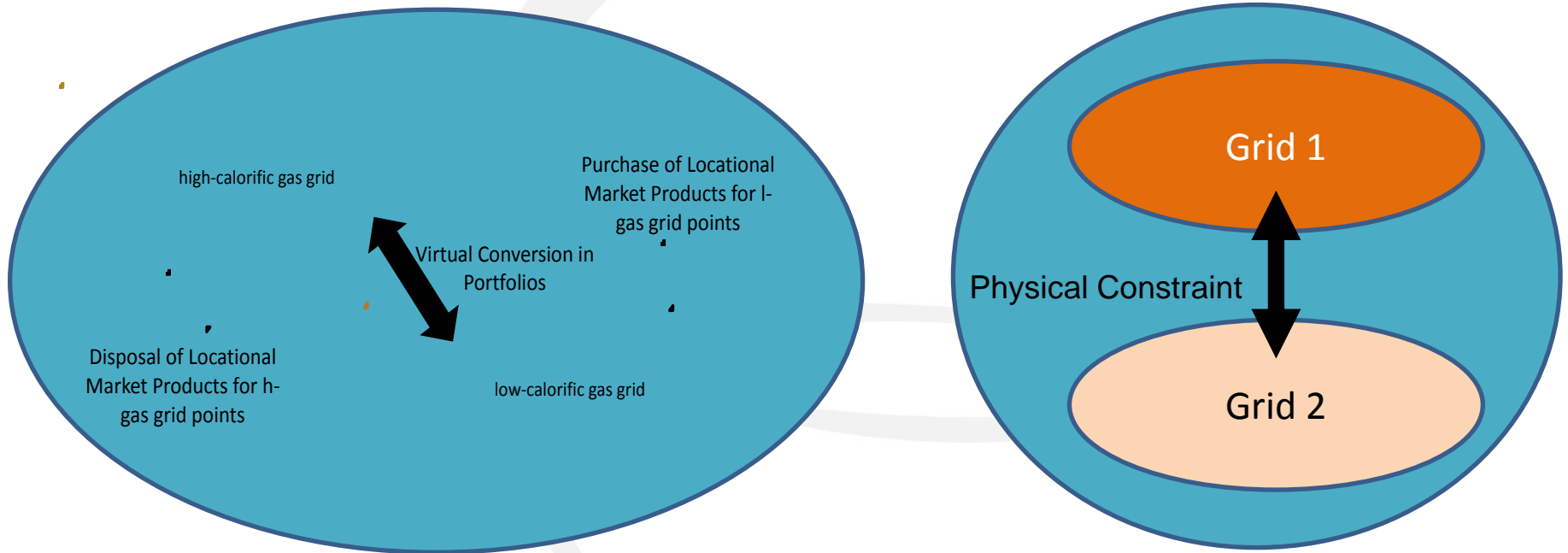
Rationale and/or evidence

- Trading in L&T products will have a limited liquidity level so their prices should not feed into the derivation of the weighted-average price (WAP)
- L&T trades are generally taken to address constraints or within day issues; thus they are not reflective of the costs of the end of day balancing
- L&T products should be used only to resolve localized transportation constraints
- Others

Consider maintaining the rule that Marginal Buy Price and Sell Price are solely based on Title trades. However a specific measure is required to allow for more detailed consideration if TSO mainly uses locational products and link of TSO actions to Marginal Price is lost

Locational Trades

- Need for Locational Trades will continue – linked to extending balancing zones, some examples below....



- It should be noted that non inclusion in marginal pricing means costs will need to be socialised

Imbalance Charge: preference for single price cash-out

Feedback received

Stakeholders: European Association favours a Single Price cash-out

Rationale and/or evidence

- Reduces risks to Network Users
- Supports a helper concept

not consider amending the code on this topic as it is not in-line with framework guidelines.

Imbalance Charge: Source of trades

Feedback received

Stakeholders: Unanimous stakeholder support for imbalance prices being set based upon trades from exchanges and platforms

Stakeholders: Some stakeholders seek limitation to one platform

Rationale and/or evidence

- Transparency
- Non Discrimination
- Simplicity

Consider amending the code so trades for imbalance prices only from trading platforms. ENTSOG is not proposing to limit TSO to one platform for this

Imbalance Charge: Day Ahead trades

Feedback received

Stakeholders: Majority of Stakeholders support within day trades only in imbalance price

Stakeholders: Some stakeholders support local discretion, while some support day ahead trades inclusion (and some as interim measures)

Rationale and/or evidence

- TSO should only take Balancing actions within day
- Day ahead prices do not reflect system needs
- Simplicity

Consider not amending the code as balancing not limited to within day. ENTSOG considering separate amendment in merit order to prioritise balancing on within day. Allows signal to be sent day ahead



european network
of transmission system operators
for gas

Linepack Flexibility Service

Linepack Flexibility Service

- All of the respondents on this Chapter supported the additional criteria set-out
- Some had additional views

Linepack Flexibility Services: Favour explicit service

C&I #s: 57

Feedback received

Stakeholders: Some stakeholders favour an explicit Linepack flexibility Service

Rationale and/or evidence

- Maintains principle of Network User responsibility for Inputs and Offtakes
- Encourages Network Users to forecast better, participate in wholesale market

Consider amending the code so that use of service must be via nominations, given maintains Network User responsibilities, provides TSP notice of intentions

Linepack Flexibility Service: Criteria

C&I #s: 70

Feedback received

Stakeholders: Link to existing WDOs should be stronger

Stakeholders: Should be offered at “market price” and have characteristics of storage products

Rationale and/or evidence

- Text suggest can place in paralel with existing WDO
- Risk of distorting market for flexible gas and market for storage

Consider a code change to explicitly state reduction of WDOs is priority over offering linepack service



fair partner to all



european network
of transmission system operators
for gas

Tolerances

Tolerances

- Almost unanimous support for price tolerances
- Almost unanimous support for tolerance based on average price

Tolerances: limitations on application

C&I #s: 60


Feedback received

Stakeholders: Tolerances should be limited to situations where:

- A Liquid Short Term Wholesale Gas Market or short term flexible gas;
- Sufficient information regarding their Inputs and Off-takes

Justification

- Use of “may” in Article 51(5)1 could allow the application of tolerances in other cases than those specified



***Consider amending Article 51(5)1
For example, Where ... and ...,
Tolerances may only be applied to Network Users***

Tolerances: obligation where info. and liquidity lacking

C&I #s: 61

Feedback received

Stakeholders: Tolerances should be an obligation of TSOs where there is not:

- A Liquid Short Term Wholesale Gas Market or short term flexible gas;
- Sufficient information regarding their Inputs and Off-takes

Rationale and/or evidence

- 2% NDM forecast accuracy is provided as a benchmark for offering tolerances.

not consider code change given

NRA maintains an option to introduce tolerance (as amendment of TSO proposal or absence of one) under Article 41 of Gas Directive

Tolerances: structure of quantities

C&I #s: 64

Feedback received

Stakeholders: Objection about the use of tolerances with a classification for NDM only

Stakeholders: Concern raised about exposure of Network Users under German national regime due to reliance on forecasts (TBC)

Rationale and/or evidence

- Network Users could face equal or larger risks for IDM and DM

- None provided

Not consider a code change given

tolerances are allowed under the NC for IDM and DM under Article 51(5)7; they are not restricted to NDM



european network
of transmission system operators
for gas

Neutrality

Neutrality

- Stakeholders views differ on level of detail in neutrality
- Stakeholders views on sub issues quite split

Neutrality: recovery for “efficient” costs, not “any” costs

C&I #s: 77

Feedback received

ACER: Code must establish that

- TSO is only entitled to recover efficiently incurred costs and not any costs\
- Determining efficiently incurred costs and what may be included in the TSO revenues remains a key task of the NRA

Rationale and/or evidence

- Principle of incentives in FG is that only efficiently incurred costs for balancing activities can be recovered



ACTIVE...but need to consider in context of incentives

Neutrality: more specificity on transparency

C&I #s: 28

Feedback received

Stakeholders: some favour increased transparency needed in terms of frequency, scope and depth of information

Stakeholders: most view think NC level appropriate and detail should be left to national regimes

Rationale and/or evidence

- Transparency a key element of a balancing regime

- Network Code provides the requirement that it must be dealt with on a national level

consider a change to the Network Code to be more specific on the minimum level of information the TSO must publish

Neutrality: degree of prescription

C&I #s: 25, 27, 29

Feedback received

- **Stakeholders:** Too much discretion left to NRAs; more detail needed to harmonise issues, for example:
 - Level of certainty for Network Users
 - Basis of apportionment
- **Stakeholders:** detail of rules should be left to national regimes

Rationale and/or evidence

- NRAs can be biased – ranging from promoting recently-introduced regimes or relying on historic practices
- NRAs, aware of national circumstances, are best placed to define an appropriate neutrality regime



Consider not expanding the Neutrality Chapter

Neutrality: Treatment of Variant 2

Feedback received

- **Stakeholders:** some stakeholders view that there should be a separate neutrality pot where Variant 2 is used in a system

Rationale and/or evidence

- Under V2, final NDM offtake allocation is deemed equal to the day-ahead forecast. This means that no end-of-day cash-out charges apply for NDM offtake. However, the TSO may have been required to take balancing actions for NDM Offtakes
- Cost targeting

Consider including a requirement for a separate NDM Neutrality Pot where Variant 2 is used

Neutrality: split pots

C&I #s: 26, 30

Feedback received

- **Stakeholders:** split pots needed where cross-subsidies evident, for example within day obligations.
- **Stakeholders:** one pot should be maintained for simplicity

Rationale and/or evidence

- Allows better cost targeting to those who caused them
- Simplicity is important
- Costs outweigh benefits
- Not material in many countries



Consider not putting further description in this section

Neutrality: Credit Arrangements

C&I #s: 32

Feedback received

Stakeholders: Credit arrangements should cover wider balancing charges and not simply balancing neutrality charges

Stakeholders: Any credit arrangements put in place should be reasonable and not undue to new entrants / small users

Rationale and/or evidence

- Main exposure, i.e., the default risk, is to imbalances and not neutrality

- Agree with concept but needs to be better balanced

Consider an amendment of the Draft Code so that such arrangements are not restricted to neutrality charge and applies to all charges, must be reasonable and proportionate to the purpose



entsog

fair partner to all



european network
of transmission system operators
for gas

Nominations

Nominations

- Majority support timings and approach to nominations
 - Almost all have comments on specifics

Nominations: duration of any transitional measure

C&I #s: 22

Feedback received

Rationale and/or evidence

Stakeholders: Generally measure acceptable but should not be treated like a interim measure with a 5-year transition period

- To ensure balancing target model is delivered

Consider amending the code so as to limit this measure to a maximum of three years from entry into force

Nominations: procedures at non-IPs

C&I #s: 5

Feedback received

Stakeholders: Minimum common rules non-IPs

Rationale and/or evidence

- Network Users need to be able to balance their portfolio flexibly during the gas day and LNG, storage and production sites are important sources for this flexibility

***Not consider amending the Draft Code given
- Outside scope of Framework guidelines***

Nominations: shorter lead times for noms/re-noms and matching

C&I #s: 13

Feedback received

Stakeholders: Two hours is a too long time for matching process and confirmation

Rationale and/or evidence

- Gives greater flexibility

Not consider a change in the Draft Code given

- ***Harmonisation must consider all Ips***
- ***Legal text allows for shorter periods - "within 2 hours"***
- ***matching process at IPs, which takes more time than those points, is not used***
- ***For many zones, or national regimes, moving to two hours will be a major change***
- ***Period mirrors EASEE-gas rules***

Nominations: compatibility with CAM Network Code

C&I #s: 13

Feedback received

Stakeholders: Some Stakeholders raised issue of timing of capacity windows for within day auctions versus re-nomination times

Rationale and/or evidence

- Potential incompatibility

ENTSOG is aware of this issue and a proposed resolution will be included in the upcoming Stakeholder Engagement document being issued

Nominations: reducing capacity due to physical constraint

C&I #s: 2

Feedback received

Stakeholders: Stakeholder opposition to “TSO may take constraints into account’

Stakeholders: Stakeholder query application of TSO intervention for imbalances

Rationale and/or evidence

- Too strong a right on TSO
- Intention not clear

Consider amending Network Code to replace both Items with Alternative text. However the balancing network code will not provide capacity management rules – outside scope of balancing



fair partner to all



european network
of transmission system operators
for gas

Information Provision

Information Provision

- Majority of Stakeholders support Information Chapter in relation to 3 models
 - Many with specific comments on details of Chapter
- Some seeking greater than that provided in Information Provision Chapter
- Significant amount of Stakeholders seeking further clarity that provisions are not in respect of Within Day Obligations

Info. Provision: Variant 2 treatment

C&I #s: 37

Feedback received

Stakeholders: Large majority support the extra consultation for new Variant 2s

Stakeholders: Some state Variant 2 should not be allowed

Stakeholders: Some state existing V2 models should have extra consultation

Stakeholders: Some state all models should be subject to extra consultation

Rationale and/or evidence

- Not consistent with overall objectives of framework guidelines

- Equal treatment

- Equal treatment

Not consider amending the code given

the clear mandate in the FG. Keep consultation for new Variant 2.

Info. Provision: Additional measures in CBA

C&I #s: 42

Feedback received

Stakeholders: Several Stakeholders believe accuracy needs to be considered

Stakeholders: Some believe Identification of Payers and Benefitters important

Stakeholders: Detailed suggestion – e.g. IT systems

Rationale and/or evidence

- timing of information provision also linked to accuracy
- Allows for fuller assessment and debate
- Specific proposals

Consider amending the CBA to include accuracy as a requirement and include roles. Do not propose to include technical specifics – this is the CBA

Info. Provision: CBA earlier than 2 years

C&I #s: 44

Feedback received

Stakeholders: Some stakeholders believe CBA on increasing frequency and extent of information provided should be done as soon as possible and < 2 years

Rationale and/or evidence

- Given importance of information provision to Network Users

Not consider a code change given:

- ***The current draft states "within two years, which allows for earlier development of CBA***
- ***Significant consultations that TSO must do upon entry into force of NC;***

TSOs' heavy consultation load upon entry into force (eif) of NC

NOT EXHAUSTIVE

TSO CONSULTATION REQUIREMENTS			
Topic	Who consults	Subject of consultation	Timing
Interim measures: roadmap (annual)	TSOs concerned (which seek to avail of interim measure(s))	on relevant parts of first report and the roadmap therein	1) consultation deadline: before submitting the first report; 2) submitting the first report for NRA's approval: within 3 months followin the date of eif of the NC
		on relevant parts of subsequent report(s) and the roadmap(s) therein	1) consultation deadline: before submitting the following reports for NRA's approval; 2) submitting the subsequent reports: every 12 months
Interim measures: contracts for flexible gas	TSOs (which seek to avail of this interim measure)	on specific proposals to be implemented as interim measures for release of any surplus flexible gas under long term contracts in force	Timings as specified above
WDOs	TSO (which has existing WDOs at the date of eif of the NC)	on WDOs that exist at the date of eif of the NC	within 6 months from the date of eif of the NC
WDOs	TSO (which seeks to introduce any WDO)	on WDO that is proposed to be introduced, including the methodology and assumptions used in arriving at the conclusion that this WDO meets the criteria specified in Item 1, Article 31	no timing specified
Cross-border cooperation	TSOs with common boundaries of their Transmission Systems	on proposals for project development (options for cooperation)	no timing specified



TSO NOTIFICATION FOR NRA APPROVAL	
Daily Imbalance Charge	Notification of Daily Imbalance Charge Calculation Methodology (including calculation of Small Adjustment) to the relevant national regulatory authority for approval.
Neutrality	Notification of Methodology for Balancing Neutrality Charges
Information Provision	Notification of Model for Info Provision to be applied in Balancing Zone

NRA may consult as part of approval process

Info. Provision: accuracy incentives

C&I #s: 40

Feedback received

Stakeholders: Several stakeholders view that incentive on accuracy should be an obligation

Rationale and/or evidence

- Information is very important to Network Users

Not consider changing code given:

- *Some systems already “accurate”*
- *Earlier slide on stakeholder role*
- *Needs national consideration for specifics (many parties involved)*
- *NRA role important –incentives remain in NRA control*

Info. Provision: provision of first NDM forecast

C&I #s: 16

Feedback received

Stakeholders: Call for the anticipation of the deadline for the provision of the first NDM Forecast in D-1 from 12:00 to 11:00.

Rationale and/or evidence

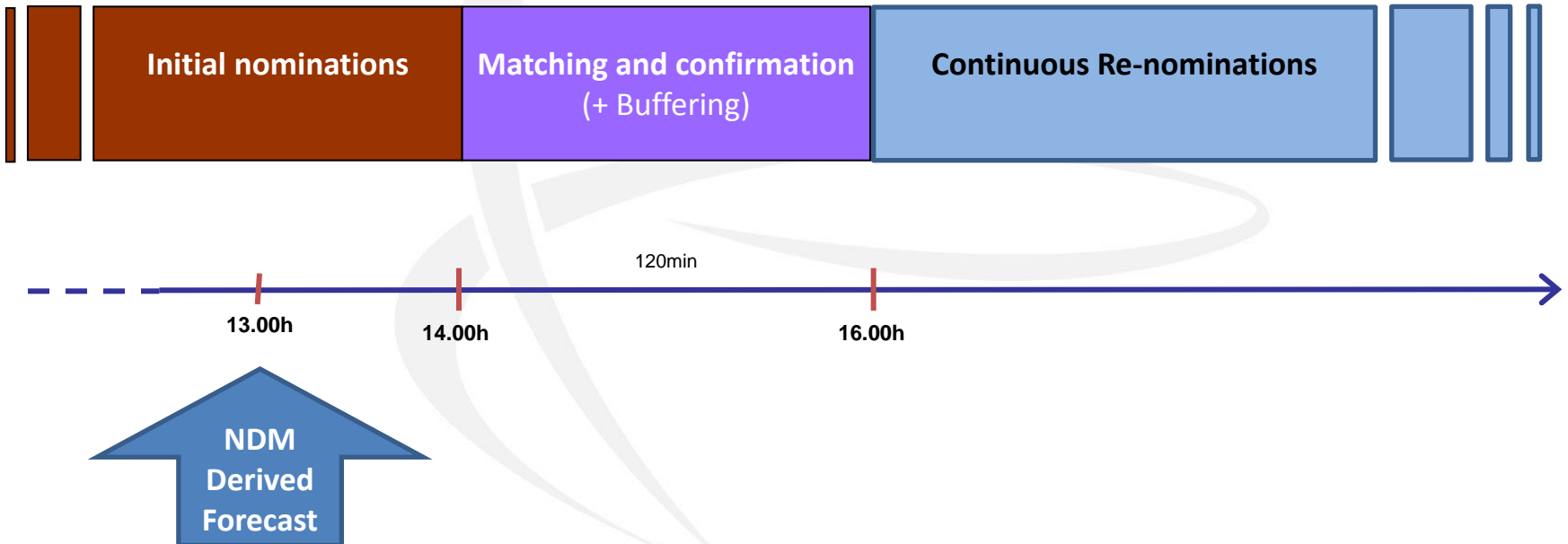
- Network Users will have a longer period to elaborate forecasts on the basis of D-1 NDM forecast.
- Network Users allowed more time also to manage portfolio

Not consider a code change given:

- *significant and complex interactions required to prepare (TSO/ DSO / Forecasting party/ NU)*
- *rule is only to applies only for IP noms: network users likely to have further options.*
- *NDM Derived Forecast accuracy likely to reduce if information is provided much earlier*
- *access to data become problematic if too early in the day*
- *Network Users can renominate*

Clarification of Timings

- All times are local time CET
 - Take away 1h for UTC winter time, 2h for UTC day-light saving



Info. Provision – other key issues

C&I #s: 70

Feedback received

Stakeholders: Granularity of Information

Stakeholders: Info for WDOs

Stakeholders: Transparency Guidelines

Rationale and/or evidence

- Allows better management of portfolio
- Needed to manage risks and opportunities in same way it is for daily balancing
- Implementation unsatisfactory

Consider no change on granularity, WDO info in this afternoons session. Separate on Transparency platform underway



fair partner to all



european network
of transmission system operators
for gas

Within Day Obligations

Within-day obligations: More details on WDOs – definition of types of WDOs

C&G #: 2

Feedback received

- Stakeholders wanted to identify the different types of within-day obligations in the NC.

Rationale and/or evidence

- Stakeholders argue that the section on WDO should provide specification beyond the principles in the FG and provide for a higher level of harmonisation.

Consider incorporating three different types of Within-day obligations in the network code

Definition of WDO

- A Within-Day Obligation is
“a set of rules and consequences regarding Network User’s actual Inputs and/or Off-takes during the Gas Day.”

Types of WDOs

WDOs will incentivise network users to

1. Keep the system within its operational limits, and/or
2. Keep their individual position during the day within a specified range, and/or
3. Limit gas flow and/or gas flow variation at specific entry/exit points or groups of entry/exit points, under specified circumstances.

System-wide WDOs

- Incentivise network users collectively to
 - Keep the system within its operational limits
- The rules provide
 - Operational limits which the system has to stay within
 - The action the TSO will take when limits are reached
 - The attribution of cost/revenues for these balancing actions to the network users
- Network users are collectively incentivised
 - To keep the system within specified limits
 - Through the consequences of a balancing action taken by the TSO – consequence can be financial and/or for within-day positions
 - based on their individual within-day position

Portfolio WDOs

- Incentivise network users to
 - Keep individual position during the day within a specified range
- The rules provides for each portfolio
 - Limits which the position has to stay within
 - The consequences of exceeding these limits consequence can be financial and/or for within-day positions
- Network user will be incentivised
 - To keep their position within specified limits
 - Through the consequences of exceeding their individual limits

Limit gas flow/flow variations

- Incentivise network users
 - Limit gas flow and/or gas flow variation at specific entry/exit points or groups of entry/exit points
- Rules provide
 - Limitations in flow and/or flow variation
 - The e/e points or groups of points to which they apply
 - The conditions under which they apply
- Network User will be incentivised
 - To keep system within operational limits
 - Through obligations or incentives on flows/flow variations

Use of WDO

- TSO uses either type 1 or type 2
- Type 3 can be used
 - Separately or
 - In combination with type 1 or type 2
- To reduce the level of cross-subsidisation
 - TSO can choose to have different WDO for different groups of off-takes or inputs
 - motivated by
 - different information being available for different entry/exit points
 - similar use of the system by different groups of network users
 - These different WDOs can be of the same or of different types

Applying WDO

- Choice for a type and specific design depends on
 - System topology
 - Flow scenarios that need to be accommodated
 - The information that the TSO can provide and the timing of that information
- Assessment of specific WDO can only be made at level of individual systems
- The network code has to ensure a robust process for this
 - Use a predefined set of criteria
 - Against which the TSO designs and tests its WDO
 - TSO assesses the likely financial impact and impact on cross-border trade and new entry
 - Consult stakeholders on this design and test against criteria
 - Get NRA approval of the WDO

Pre-conditions and criteria for WDOs

Pre-conditions

- It is necessary to incentivise network users to
 - reduce the role of the TSO and
 - ensure system integrity

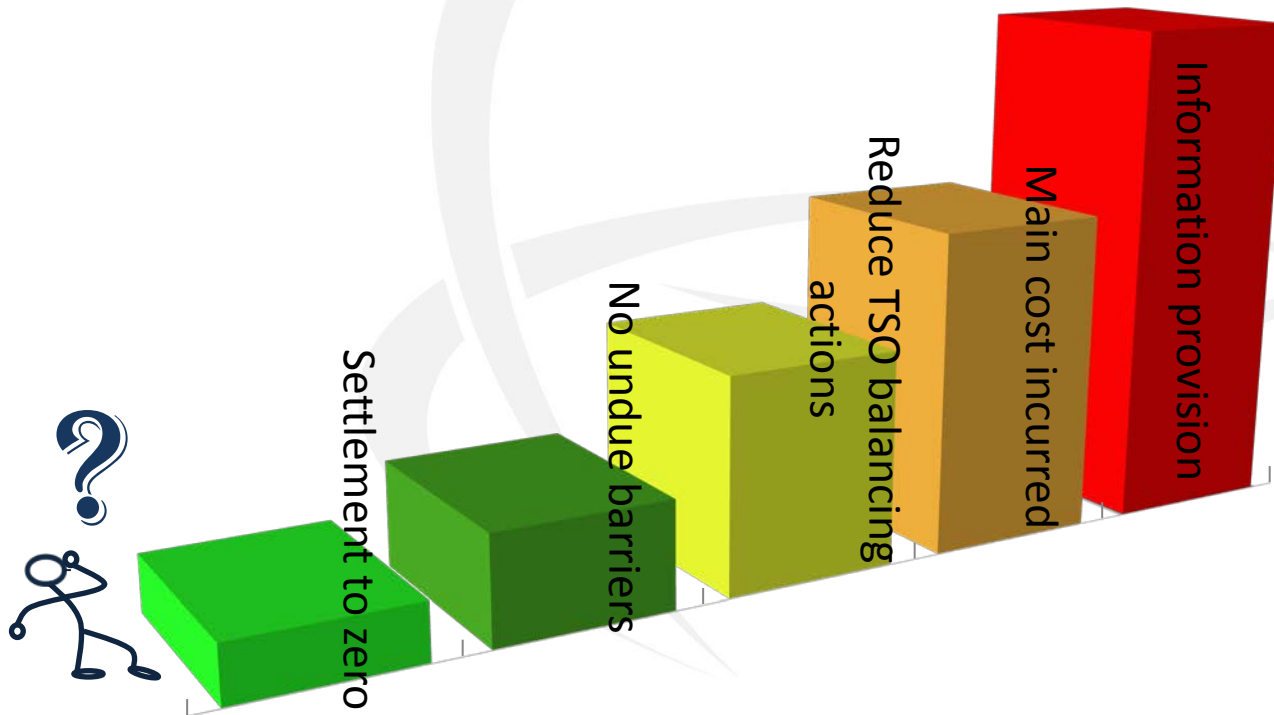
Criteria WDO has to meet

- WDO doesn't act as undue barrier to
 - cross-border trade
 - new entry into the market
- Network users have sufficient, sufficiently accurate and timely information to be able to comply with the WDO
- Main cost incurred by network users relates to their position at the end of the day
- Related charges shall
 - Be cost reflective to extent possible
 - Not pose undue barriers to
 - Cross-border trade
 - New entry into the market
- No obligatory settlement of network users to zero during the day

Information provision

- Choice on type of WDO depends on information available
- Can TSOs provide
 - Real-time info on system position
 - Real-time portfolio info
 - Real-time flow info
 - Real-time allocations based on agreed algorithms
 - Ex post portfolio info
- Do network users have other sources of information
 - Portfolio information
 - Information from end consumers
 - Information on potential flow variations

Introducing WDOs



Within-day obligations: Merging criteria for TSOs and NRAs in the consultation process

C&G #: 1

Feedback received

- **Stakeholders:** Stakeholders argued that the criteria that the TSO addresses in their WDO-proposal should be the same as the criteria that the NRA uses to assess the impact of the proposal.

Rationale and/or evidence

- The criteria that the NRA should check must be the same as the TSO is using to design any wdo.
- There can be one list and this list is then to be used by both TSO and the NRA.
- Better structure and more clarity would be created.

Consider changing the Draft Code to have one single list of criteria that would apply to both TSOs and NRAs



fair partner to all



Next steps in development process of Draft Code on Balancing

Refinement Workshop

Tori Gerus
Adviser

Brussels - 26 July 2012

FROM stakeholder issues TO Analysis of ENTSOG Decisions supporting document

Tolerances: preference for roll-over approach

C&I #6: 62

Feedback received

Stakeholders: Preference for a roll-over tolerance approach over price-based approach

Justification

- Experience in France, where it gives small competitors' flexibility to offset the high volatility of forecast of NDM offtakes

ENTSOG is not considering amending the Draft Code given the price tolerance approach was developed via the SJWS process with the purpose of maximising liquidity



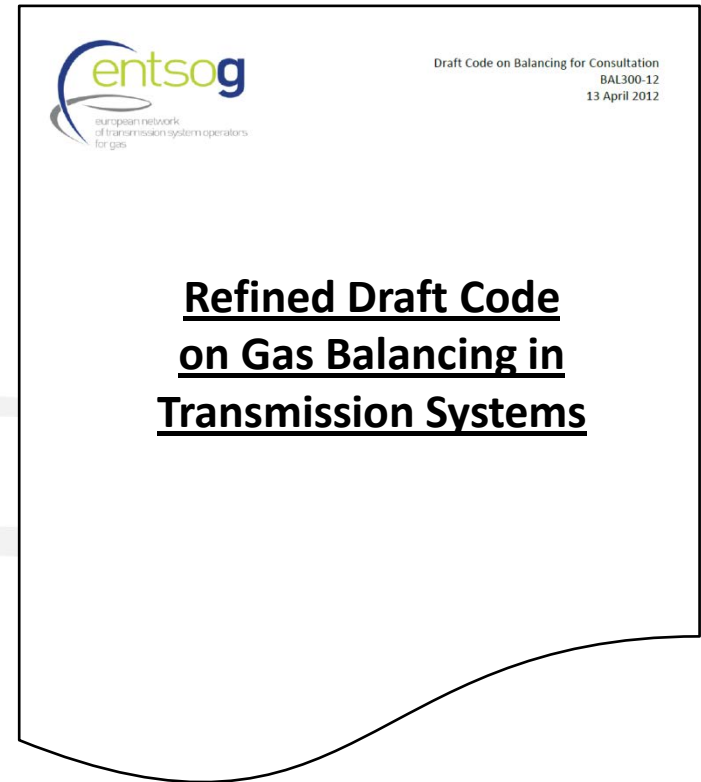
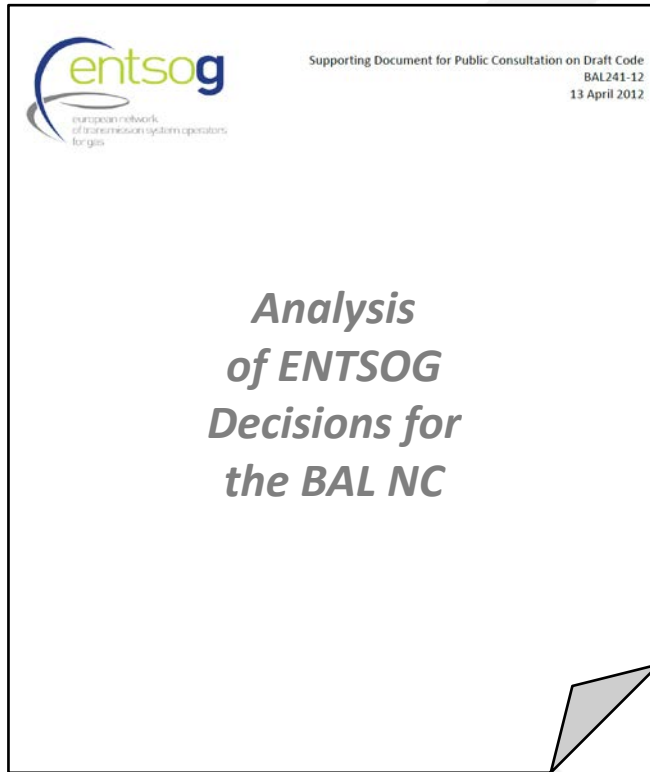
34

Preference for carry-over tolerances

A stakeholder expressed a preference for a roll over tolerance as opposed to a price tolerance but provided no substantiation for its view.

The Refined Draft Code continues to propose a price tolerance approach. As explained in section B.4. above, price tolerances are the preferred policy option because this approach maximises liquidity and provides for an easier transition to the preferred outcome of imbalance cashout at marginal prices.

Stakeholder Support Process: 14-28 September



SSP: measure of general support for process and substance of NC

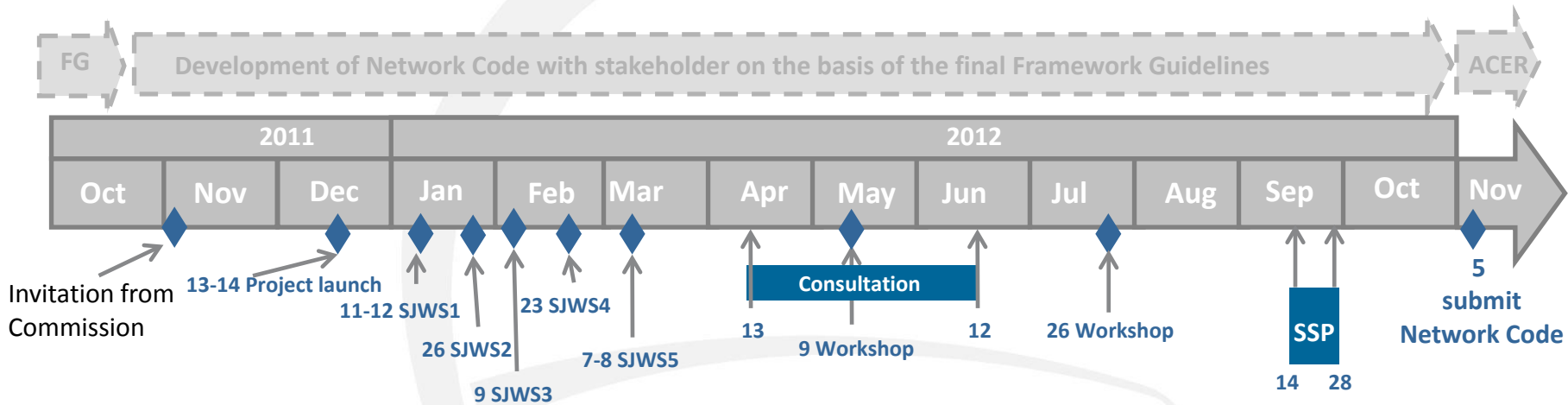
CAM NC EXAMPLE

Question 3: Please complete the table below, indicating whether you support the relevant sections of the CAM NC, having regard to the process carried out and ENTSOG's aim to reflect the views of the majority of users during the development process.

Section	1-2: Rationale and Application	3: Principles of co-operation	4: Allocation of firm capacity ²	5: Cross-border capacity
Support				
Do not support				

Section	6: Interruptible capacity	7: Tariffs	8: Booking platforms	9-11: Legal provisions
Support				
Do not support				

Completing refinement phase: today - 4 Nov.



Main phases of activities of ENTSOG and stakeholders in BAL NC process

ENTSOG	Development of launch documentation	Development of draft network code in cooperation with stakeholders	Refinement of network code based on the feedback by stakeholders
Stakeholder		SJWS SJWS SJWS SJWS SJWS	Feedback on drafted Network Code by ENTSOG Workshop SSP

Thank You for Your Attention

Victoria Gerus
Adviser

ENTSOG -- European Network of Transmission System Operators for Gas
Avenue de Cortenbergh 100, B-1000 Brussels

EML: victoria.gerus@entsog.eu
WWW: www.entsog.eu





fair partner to all
