

## Consultation document on ENTSOG TYNDP 2015

Through this document, European Network of Transmission System Operators for Gas (ENTSOG) launches a formal public consultation on its Ten-Year Network Development Plan (TYNDP) 2015 published on 16 March 2015.

ENTSOG published TYNDP 2013-2022 in February 2013 and, during the subsequent consultation, received valuable feedback from the stakeholders, including ACER Opinion (September 2013). For the TYNDP 2015, ENTSOG has pursued its stakeholder engagement process organizing Stakeholder Joint Working Sessions from January to May 2014, two public workshops in November 2013 and June 2014 and many bilateral talks. It was a joint process covering both the development of TYNDP concept and the adaptation of the CBA methodology under the TEN-E Regulation. Considering the strong link between TYNDP and CBA methodology, the feedback received through this questionnaire will be factored in both deliverables.

ENTSOG has endeavored to take into account all comments received and encourages stakeholders to stay actively involved in the TYNDP process. Through their response to this public consultation, stakeholders will help ENTSOG to measure in which extent TYNDP 2015 meets their expectations (Part A) and to prepare next edition (Part B).

This consultation will be open today and will end on 5 June 2015. Responses should be submitted by email to the following mail box: [tyndp@entsog.eu](mailto:tyndp@entsog.eu).

This public consultation should not only be taken as a regulatory obligation by ENTSOG but as a necessary step for the continuous evolution of the TYNDP, aiming the fulfillment of reader's expectations.

## 0. Contact details

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### How would you describe your organisation?

<input type="checkbox"/>	Association (please specify type)
<input checked="" type="checkbox"/>	Project promoter
<input type="checkbox"/>	End user
<input type="checkbox"/>	Network user
<input type="checkbox"/>	Trader
<input type="checkbox"/>	Other (please specify)

## PART A – Feedback on TYNDP 2015

### 1. Infrastructure Chapter

In which extent this chapter meets your expectations?				
Poorly:		Sufficiently:	<b>X</b>	Perfectly:
Which parts of this chapter you particularly appreciate, if any?  <b><i>The comparison with the previous TYNDP on the state of play of the implementation (i.e. FID) of infrastructure projects is very insightful.</i></b>				
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?				

### 2. Barrier to investment Chapter

In which extent this chapter meets your expectations?				
Poorly:		Sufficiently:	<b>X</b>	Perfectly:
Which parts of this chapter you particularly appreciate, if any?  <b><i>This chapter gives a concise presentation of identified barriers by project promoters. The shown interplay between barriers coming out of the regulatory framework and the market environment is to be praised as it shows the interrelatedness between various factors in the investment climate.</i></b>				
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?  <i>An annex could be added to the next TYNDP that details the various responses, perhaps grouped on a regional basis to indicate how the investment climate differs in different regions in Europe.</i>  <b><i>For the next TYNDP, stakeholders could be asked to give their view on the effect of the application of the Network Codes on the investment climate.</i></b>				

### 3. Demand Chapter - Analysis of historical demand

In which extent this section meets your expectations?				
Poorly:		Sufficiently:		Perfectly:
				<b>X</b>
Which parts of this section you particularly appreciate, if any?  <b><i>The breakdown in different elements of gas demand, most notably the focus on power</i></b>				

<b>generation.</b>
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?

#### 4. Demand Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?				
Poorly:		Sufficiently:	<b>X</b>	Perfectly:
Which parts of this section you particularly appreciate, if any?				
<b>The transparent make-up of the different scenarios.</b>				
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?				

#### 5. Supply Chapter - Analysis of historical supply

In which extent this section meets your expectations?				
Poorly:		Sufficiently:	<b>X</b>	Perfectly:
Which parts of this section you particularly appreciate, if any?				
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?				

#### 6. Supply Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?				
Poorly:		Sufficiently:	<b>X</b>	Perfectly:
Which parts of this section you particularly appreciate, if any?				
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?				
<i>Self-generated ramp-up scenarios have an effect on the assessment chapter given the 5 year granularity period applied – e.g. as with Azerbaijan pipeline gas scenario in figure 5.49.</i>				

#### 7. Assessment Chapter

In which extent this chapter meets your expectations?				
Poorly:	<b>X</b>	Sufficiently:		Perfectly:
Which parts of this chapter you particularly appreciate, if any?				

***The use of maps makes the presentation readable.***

Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?

***The assessment methodology is very complex, and complexity induces the risk of coming to not very robust conclusions. The assessment is also overly coloured by one risk, namely the risk of interruption of supplies through the Ukraine.***

### 8. Layout of the report (clarity of the analysis, graphical representation...)

In which extent do you consider that the form of the report support its content?

Poorly:		Sufficiently:	<b>X</b>	Perfectly:	
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Which layout elements you particularly appreciate, if any?

***Enough space, no dense text. However, navigation through the report could be improved (especially for the longer chapters) by including a more detailed table of contents.***

Do you have any specific concerns regarding the layout of the report? If yes, do you have any suggestion?

***Although the pictures are very nice, they do not contribute to the readability of the report. Suggest deletion, at least the pictures in the chapters themselves as opposed to cover pictures.***

### 9. Stakeholder engagement process

Do you consider that ENTSOG offered you sufficient opportunity to be involved in TYNDP process?

Yes:	<b>X</b>		No:	
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Have you taken part in any public workshop or Stakeholder Joint Working Session related to TYNDP 2015?

Yes:	<b>X</b>		No:	
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Which part of the process have you particularly appreciated, if any (public workshop, Stakeholder Joint Working Sessions, bilateral meetings, data collection...)?

***We appreciate the constant availability of the ENTSOG team for bilateral contact.***

Do you have any suggestion regarding how ENTSOG could improve the engagement process?

***We would appreciate to be informed of the exact stage of the development process at each***

**communication.**

***Any questions to be posed to stakeholders in working sessions should be communicated in advance. This allows participants to prepare a more detailed response.***

***Make sure that new information is not hidden inside presentation, i.e. slide packs should function as a means of presentation – defined processes to be set out in a guiding document.***

**10. General comment**

What is your overall appreciation of TYNDP 2015?									
Very poor		Poor		Average	<b>X</b>	Good		Very good	
Do you have any additional comment on the extent in which TYNDP 2015 meets your expectations?									
<b><i>Although we greatly appreciate the work produced, the complexity of the methodology makes it hard to obtain main takeaways and draw vast conclusions.</i></b>									

**Part B – Preparation of the next edition**

**11. Project maturity**

The quality of the assessment of the European gas system depends on the accuracy of the topology of the infrastructure (the way firm capacity interlinked different systems being transmission, storage or LNG terminal).

In case projects do not have a sufficient maturity to precisely identify interconnection with existing or planned infrastructure (interconnection point, capacity increment or commissioning date not clear enough) it affects the ability to assess not only these projects but all the others both at TYNDP and CBA level. In addition the inclusion of such projects in the assessment may give an over-optimistic picture of infrastructure development.

Please provide your preferred alternative to address this situation:

To be considered in the Assessment Chapter a project should be submitted together with a document demonstrating that some prefeasibility study of its interconnection has been carried out (e.g. Memorandum of Understanding, national investment plan...). Such documents should describe the interconnection (which systems are interconnected), the capacity increment and the commissioning date.	<b>YES</b>
To be considered in the Assessment Chapter a project should be submitted in coordination by the promoters/operators of the interconnected infrastructures	<b>YES</b>

(cross-check of submissions through the online portal).	
A specific treatment should be put in place for projects where above conditions cannot be fulfilled. Such projects could be included in the Annex A of TYNDP to enable its eligibility to the PCI selection process but not considered in the Assessment Chapter.	<b>YES</b>
Other (please describe):	

## 12. Evolution of infrastructure projects

Infrastructure projects are continuously evolving and new projects appear between subsequent TYNDP editions. Nevertheless considering changes in projects happening after the submission deadline will induce significant delay in the publication of TYNDP and subsequent PCI selection. For example TYNDP 2015 has been delayed in order to consider the cancellation of South Stream upon request from EU Commission.

Please provide your opinion regarding the introduction of changes in projects:

Only the projects submitted before the deadline should be taken into account. Any changes/additions/cancellations after the deadline should be disregarded.	<b>YES</b>
As general rule, changes on already submitted infrastructure projects should not be taken into account. Nevertheless in specific cases where the impact of the change is of major relevance, it should be considered along with the delay caused by its implementation.	<b>NO</b>
If you have answered yes to the previous question, how such potential major changes should be identified and considered (e.g. formal request from the European Commission, agreement within the Regional Groups...)?	
Other (please describe):	

## 13. Assessment of sustainability aspects

In TYNDP 2015, the assessment of the sustainability focuses on the quantification of the RES production and associated gas flexibility as well as the measurement of CO<sub>2</sub> emissions from the power generation sector.

Do you agree with this approach? If not, please explain why	<b>YES</b>
Do you see other environmental perspectives that could be addressed in TYNDP assessment?	
If yes, what could be a methodology to address them?	

#### 14. Streamlining of the methodology

The Assessment Chapter from TYNDP derives directly from the CBA methodology. Preliminary feedback has shown a willingness to simplify the assessment but this would imply a downscaling of the CBA methodology to be used in the PCI selection.

Please provide your opinion:

How do you consider the balance between the complexity and the comprehensiveness of the assessment?					
Too complex	<input checked="" type="checkbox"/>	Right balance	<input type="checkbox"/>	Not comprehensiveness enough	<input type="checkbox"/>
If too complex, which part of the assessment could be removed from the methodology?					
<p><b><i>The need for all parts should be carefully assessed. The complexity of the modelling, and the leaps of faith necessary for interpreting the results increase risk with little added value in sending investment signals.</i></b></p> <p><b><i>If complexity in the model is maintained, there should be more efforts in having a unified user manual from early on in the process. This manual should only be modified after careful assessment.</i></b></p>					
If not comprehensive enough, which assessment should be deepened or added to the methodology?					

#### 15. Priority for next edition and long term monitoring of gas quality

<p>What should be the priority direction(s) of improvement for the next edition?</p> <p><b><i>Assure alignment with the Energy Community in order to give a broader picture of the situation on the European continent – for example include considerations on the coordination of PCI and PEI processes. This is very relevant when an infrastructure crosses a non-EU member state.</i></b></p>
<p>As part of the implementation of the Network Code on Interoperability and Data Exchange, ENTSOG will have to include its first long term monitoring of gas quality in TYNDP 2017.</p> <p>What are your main expectations regarding this new assessment?</p> <p><b><i>The monitoring should reveal problems yet to be solved related to gas quality.</i></b></p>