

# **Public Consultation summary**

**Development on ENTSOG AS4 / Edig@s** version 6

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### Introduction

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#### **Public Consulation**

- > ENTSOG and EASEE-gas organised a joint workshop on 04/10/18 in Brussels.
- > The workshop was attended by 55 participants.
- > Following main topics were presented to the audience.
  - ENTSOG:
    - Presentation of the draft for the updated AS4 profile v3.6 based on input received by stakeholders during the previous months
  - EASEE-gas:
    - Presentation of the updated codelist for Edig@s qualifiers
    - Harmonised Role Model for Gas and it's connection to the gas processses
    - Edig@s version 6
      - Proposed new functionalities
      - Further harmonisation approach

Agreement to have a joint public consultation after the workshop on the presented topics

#### **Public Consultation**



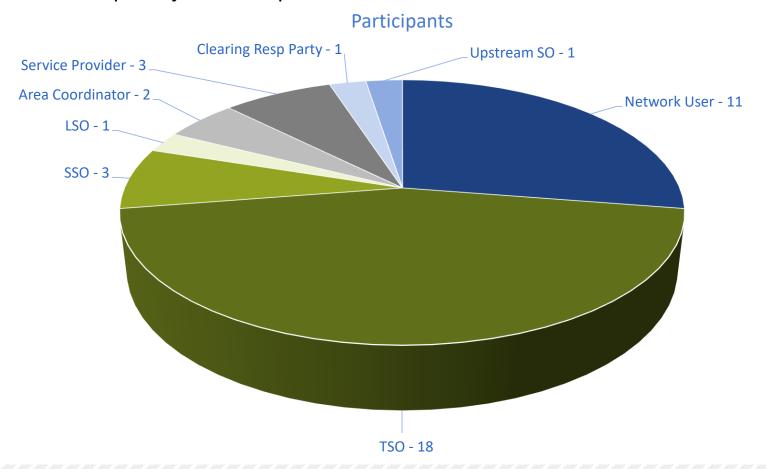
- The questions for the public consultation were jointly prepared by the ENTSOG INT team and the MWDWG (Edig@s) of EASEE-gas.
- > The Public Consultation was launched on 14/11/18
- > The intial deadline 31/12/18 was extended to 31/01/2019
- > ENTSOG and EASEE-gas promoted this public consulation via their contact list
- > ENTSOG encouraged the INT WG members to make their companies aware of the consultation
- > In addition ENTSOG used social media channels such as LinkedIn and Twitter to gain more awareness.
- > The Public Consultation was closed by 31/01/2019

#### **Evaluation**



#### **Participants**

> 32 Participants joined the public consultation.

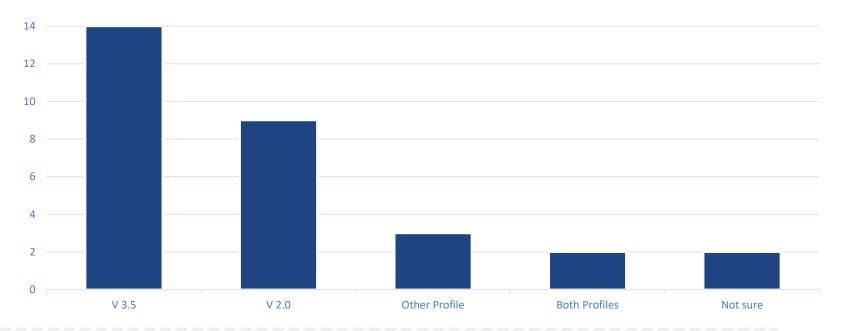


# Evaluation – ENTSOG AS4 Profile



#### Questions regarding the ENTSOG AS4 profile

- > Do you have AS4 in place?
  - 30 out of 32 participants indicated to have AS4 place
- > Did you develop your AS4 system based on the ENTSOG usage profile?
  - 3 (2 TSOs, 1 Clearing RP) use a different profile than the ENTSOG profile
  - 2 are not sure which profile their AS4 vendor is currently using



#### **Evaluation – ENTSOG AS4 Profile**



- > Do you agree with the proposed changes in the new version of the ENTSOG AS4 usage profile v3.6?
  - 20 participants supported the new development of the AS4 profile.
  - 7 didn't provide an answer to this questions
  - 5 (4 TSOs, 1 NU) are not in favor of implementing a new version

Comments: One participants mentioned to have a longer period (2 years) before changes are introduced.

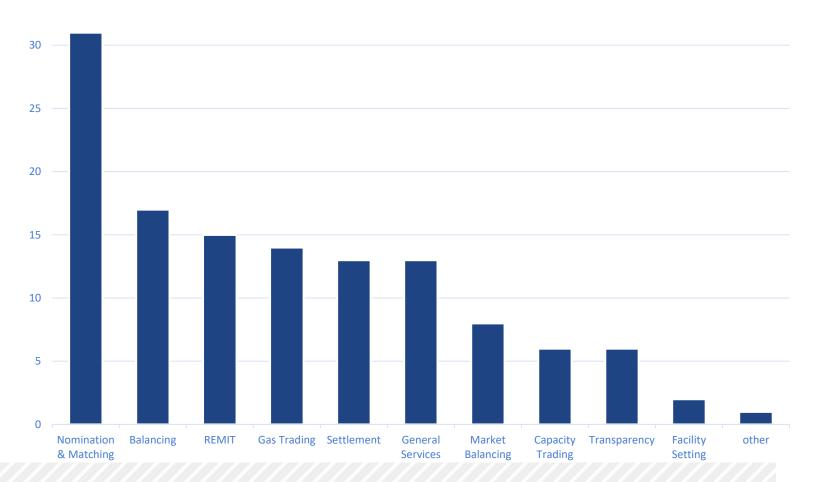
Bayernets (TSO / DE) had a very detailed comment regarding the approach of using services within the profile mentioning incompatibilities between AS4 gateways and recommending to mark those as optional like the EDIGASDocumentType Property.





#### Questions regarding the current use of Edig@s & its new version 6

> For which processes are you using Edig@s?





### Evaluation - Edig@s present situation

- > Which Edig@s version are you using? (choice between Edig@s 4 and Edig@s 5)
  - Both versions: 25 participants are using both mentioned versions of Edig@s
  - Only 1 version
    - Edig@s 4 is used as the only version by 3 participants (1 SSO, Upstream TSO, Clearing RP)
    - Edig@s 5 is used as the only version by 4 (i.a. Bulgartransgas (TSO / BG) and Elering (TSO / EE) )
  - 7 participants indicated the usage of other versions than 4 and 5 of Edig@s Comments:
  - GMSL (Service Provider / UK) is using a range from Edig@s v.1 to 5 used by their customers in European gas industry.
  - VNG (Network User / DE) indicated the usage of Edig@s 4 with the syntax Edifact (the INT NC requires the of Edig@s with XML syntax)
  - Terega (TSO / FR) is using in parallel \*.xls files and specific XML formats



# **Evaluation – Edig@s present situation**

> How do you nominate your flows today?

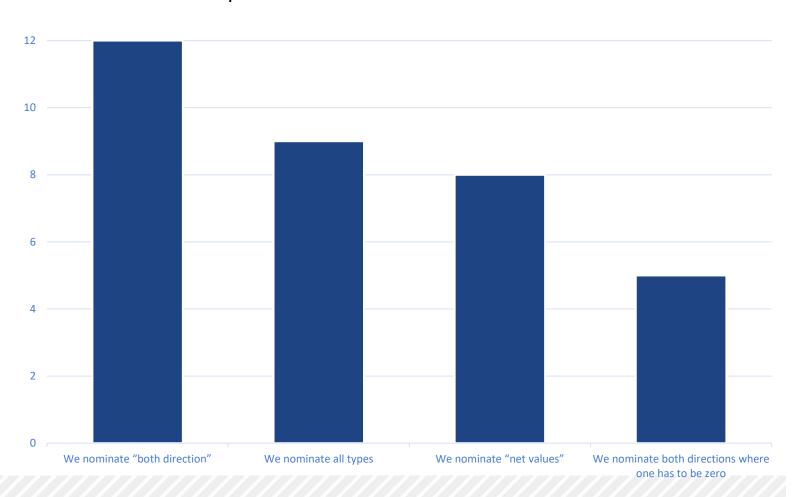
In order to have a better understanding on this question following illustration was provided in questionnaire

Hours	Both Direction		Net Values		Both Direction, one has to be zero	
	INPUT	OUTPUT	INPUT	OUTPUT	INPUT	OUTPUT
06:00 - 07:00	100	50	50		50	0
07:00 - 08:00	100	50	50		50	0
08:00 - 09:00	100	50	50		50	0
09:00 - 10:00	100	0	100	7/	100	0
10:00 - 11:00	100	0	100		100	0
11:00 - 12:00	100	150		50	0	50
12:00 - 13:00	100	150		50	0	50
13:00 - 14:00	100	150		50	0	50
14:00 - 15:00	100	0	100		100	0
15:00 - 16:00	100	0	100		100	0
16:00 - 17:00	100	0	100		100	0
17:00 - 18:00	100	0	100	7/	100	0
18:00 - 19:00	100	0	100		100	0
19:00 - 20:00	100	0	100		100	0
20:00 - 21:00	100	0	100		100	0
21:00 - 22:00	100	0	100		100	0
22:00 - 23:00	100	0	100		100	0
23:00 - 24:00	100	0	100		100	0
24:00 - 01:00	100	0	100		100	0
01:00 - 02:00	100	0	100	7	100	0
02:00 - 03:00	100	0	100		100	0
03:00 - 04:00	100	0	100		100	0
04:00 - 05:00	100	0	100		100	0
05:00 - 06:00	100	0	100		100	0



## **Evaluation – Edig@s present situation**

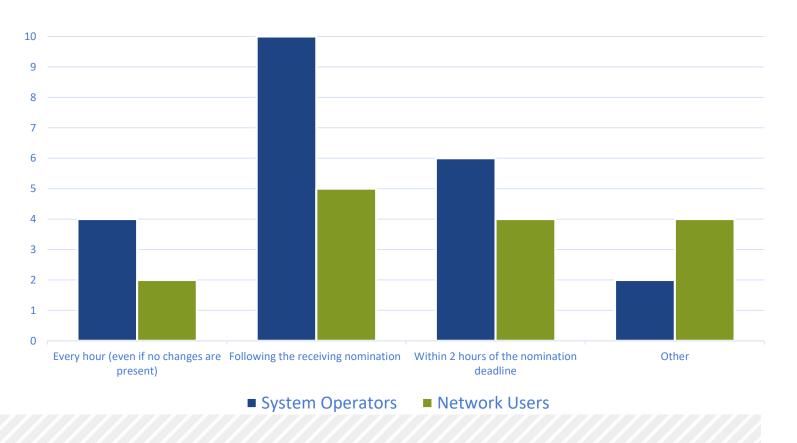
- > How do you nominate your flows today?
  - The most used option was to nominate "both directions"





### **Evaluation – Edig@s present situation**

> How do you currently receive/send\* the confirmation (NOMRES) for nominations? \*System Operators send / Network Users receive NOMRES messages Comments: 4 Network Users (i.e. Equinor (NO), ENGIE (FR), EP-Commodities(CZ)) stated this process is not harmonised across Europe

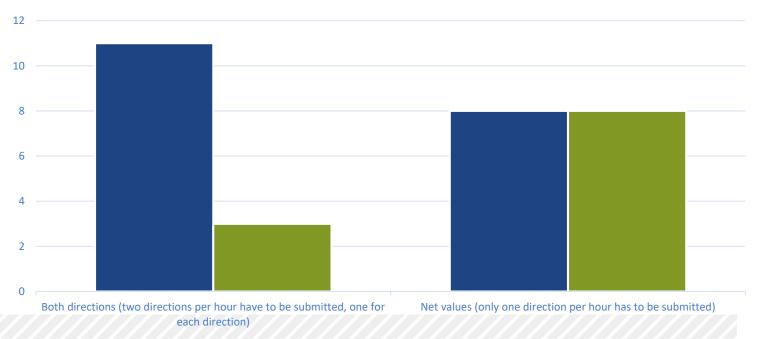




> Do you prefer to send/receive nominations/confirmations including "Both direction" or "Net Values"?

#### > Comments:

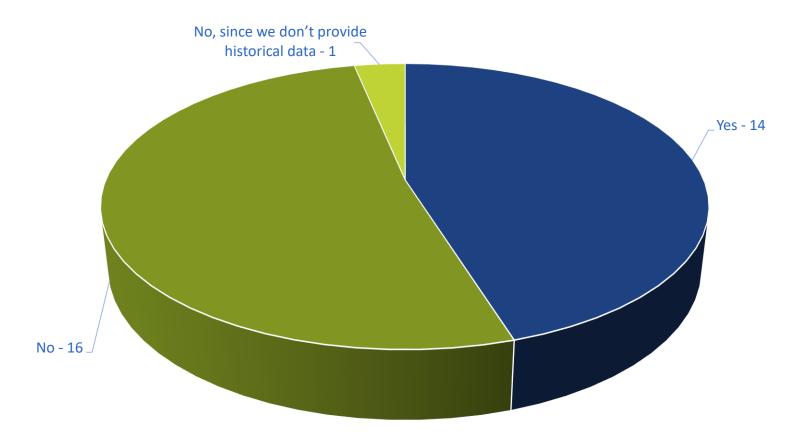
- Net values: GMSL "Net values makes most sense, but the most important thing would be consistency. If it's permitted to send both directions in any scenario, it should be mandatory in order to avoid confusion."
- Both Directions: Terega "....For a future hourly nomination process, we prefer "both directions" process allowing all possibilities to shippers because anyway both directions will be processed by TSO for the prorata temporis rights because of the possibility of several counterparties."







> Would you like that historical data (past hours at within-day messages) is checked? (1/2)







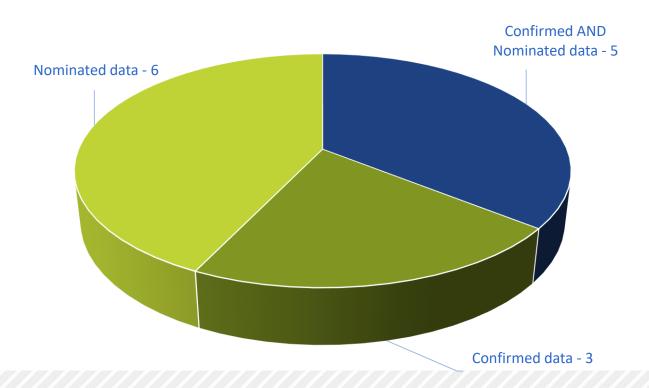
- > Would you like that historical data (past hours at within-day messages) is checked? (2/2)
- > Comments:
  - No: One Network User stated that historical data including potential error should not influence the correct future data
  - Yes:
    - GMSL It is easier for network users to see a whole gas day's position, so including hours in the past is useful. It is particularly useful when TSOs check past hours and inform the sender (via an ACKNOW) if they have attempted to change an hour for which the deadline has passed. However, this validation should \*not\* result in (re-)nominations in the same NOMINT for later hours being rejected.
    - VNG TSOs / Area Coordinators will only take hours into account that are in the leadtime. The historical data should be checked but it should not lead to a refusal but to a warning that can be sent in the ACKNOW message. It helps then finding errors in the system of the Balance Responsible Party.
    - Equinor (Network User / NO) If the TSO's ask for historical data in the nomination they need to check
      if they are correct. If not why do they require us to send them.

Suggestion to use ACKNOW messages to indicate changes within past values. This should not affect the current nomination.





- > This questions is only relevant if question 12 was answered with yes: Should historical data (in the message) being checked against nominated or confirmed data? Comments on the answer "nominated data"
  - VNG: To check against confirmed data makes it difficult for a Balance Responsible Party to keep a nomination up, e.g. in a case of temporary curtailment. To check against both creates the same problem.
     To check against nominated data helps Balance Responsible Parties to find errors in their system.







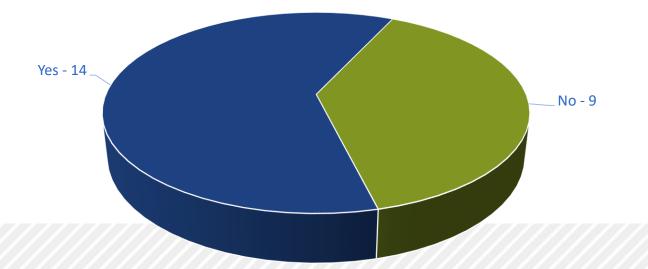
> Should invoicing message be implemented within the Edig@s version 6?

#### Comments on the answer "yes":

- VNG, ENGIE support the implementation of messages for the capacity trading process pointing out that if the national needs covered it will make a huge step forward regarding harmonization.
- ENI (Network User / IT) asked for Invoice messages for the sales process
- Equinor mentioned the reduction of manual steps by having messages for processes such as capacity, penalties and sales

#### Comments on the answer "no":

 Bayernets stated that the messages developed for the German market are complex. Messages for the usage on European would be even more complex.

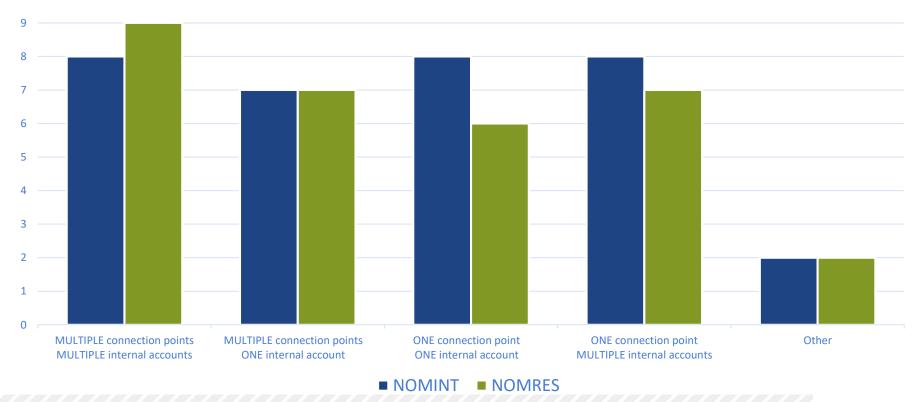






> How many connection point(s) / internal account(s) per NOMINT / NOMRES message would you like to have in version 6? (1/2)

Explanation: Edig@s messages can contain **one** or **multiple** <u>connection points</u> and **one** or **multiple** <u>internal accounts</u> per message. The purpose of this question is to understand which preferences the market has in order to have a possible limitation of the options in Edig@s v6





> How many connection point(s) / internal account(s) per NOMINT / NOMRES message would you like to have in version 6? (2/2)

Comments on the answer "other":

- Bayernets would like to extend the limitation also one external account
- One participant stated to prefer both possibilities (multiple or one connection points and multiple internal accounts)

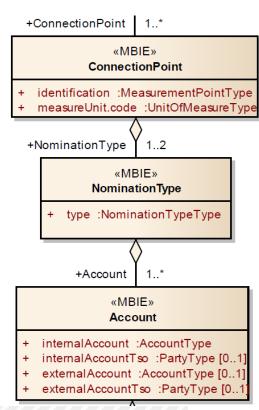
# FYI: current definition for NOMINT / NOMRES in Edig@s 5.1

Connection point: mandatory, one or many Account: 1 or many per connection point Internal Account: mandatory, only one per

connection point

External Account: optional, max one per

connection point.





- > What additional functionality / changes would you like to see in Edig@s v6
- > Comments:
  - Elering: I see that in the version 5.1 in nomint and in all messages the thing used in CIM (remark Marin: Common Information Model from ENTSOE) market messages called processType is missing. This in my mind is needed as for example nomination and renomination follow different process (overnomination for example). Currently the only thing that distinguished the messages is sending time and if there are confirmed nominations in the system. the processingtype would make it simpler to set gate open/close times for messages at receiving and also apply the business logic on them.
  - Fluxys: New type of message to ask for a required or a minimum or a maximum flow.
    - Pipe in pipe operator messages DELORD /DELRES like without direction switch --> other type ?
    - Widow issue: what do you include in a NOMRES or DELRES when you have 14G, 15G, 16G, 18G mandatory but no information to communicate.
    - Open question: integrate other format than XML E.g. JSON? In general, more use of Acknow mandatory.
    - Single side nomination is not used --> really to be kept? Heavy impact to implement VIP
  - ENI: We would find useful to receive via edig@s maintenance program/information from TSOs



- > What additional functionality / changes would you like to see in Edig@s v6
- > Comments:
  - Bulgartransgas: Additional topics to be taken into consideration: The market shall be properly informed on the planned changes. Sufficient time shall be planned for implementation of the new Edig@s version. Please consider that in line with REMIT Regulation any modifications of the electronic formats for REMIT reporting, including those based on Edig@s shall be coordinated with ACER and consulted by the Agency with the market.
  - VNG: Possibility to check account pair validity for a Balance Responsible Party towards a VTP / Area Coordinator Remove the NOMINT-NOMRES process link (the NOMRES has to refer to a single NOMINT with identification and version) Remove the OFFERS-REQEST-REQRES process link (the REQEST has to refer to an OFFERS, a REQRES has to refer to a single REQEST with identification and version)
  - Equinor: Urgent market messages should be a standard edigas message to avoid different ways of publishing REMIT incidents. We would like edig@s interfaces to be mandatory for capacity platforms and also the settlement process should be mandatory.
  - Engie: Balancing Process alignment with the current market situation Trading on Trading Platform
  - 2 Network Users stated: they would like to include all Edifact requirements from German national process GeLi Gas. A Balance account checking message was also required

# Next Steps



- > Presentation of the results to the INT WG and ITC KG of ENTSOG
- > Presentation of the results to the MWDWG
- > Consideration of the comments coming from the participants during the final development of Edig@s v6
- > Presentation of the results to the stakeholders
- > Presentation of the amended version of Edig@s 6 considering the comments at the joint ENTSOG / EASEE-gas workshop on data exchange (November 2019)





#### **Thank You for Your Attention**

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