

# ENTSOG's AWP 2014 Consultation Initial Proposal

### **Feedback Proforma**

Please use the subsequent template for Stakeholder feedback to the ENTSOG 2014 Annual Work Programme document.

Please complete and send the template and or any other feedback to <u>vittorio.musazzi@entsog.eu</u> and to <u>info@entsog.eu</u> by September, 7<sup>th</sup> 2013.

Organisation	Eurelectric
Name	Sébastien Doligé

	Q1: Does the programme identify the correct projects for ENTSOG's focus in the 2014 AWP?	

YES NO

#### **Further comments**

We are pleased to note the inclusion of IT/R&D Development Activities 1 & 2 to further analyse, in conjunction with ENTSOE, the contribution of gas to the energy mix and the gas supply flexibility required by intermittent power generation. These should focus on the ability of gas infrastructures to adapt to the resulting changing supply patterns and any investment gaps should be identified in the 10 Year Network Development Plan 2015 – 2024.

With regard to the key deliverables identified for the capacity activity, these exclude business rules specification and message definition proposals, although this deliverable is referred to in the key deliverables for the interoperability activity. It may be that this is not intended to be a key deliverable in 2014 as the PRISMA platform currently relies on interactive web based communication, but ENTSOG should clarify this.



# Q2: Are there any other activities that should displace the focus areas identified?

YES NO

### If "YES", what other priorities should be addressed?

ENTSOG should, as a priority, "bite the bullet" and accept that not all of its member companies are compliant with the legally binding obligation under Gas Regulation 715/2009 to provide near real time gas flow information at all relevant points, instead of continuing to hide behind a tenuous interpretation of what "near real time" actually means.

Whilst we welcome the work ENTSOG is doing to improve the functionality and reliability of the transparency platform, and look forward to the official presentation of this in late Autumn 2013, ENTSOG should also develop a roadmap detailing:

- how frequently each of its members currently publish gas flow data at relevant points within day
- what measures and timescales are being put in place to improve the frequency of data publication
- the platform on which this gas flow data will be published and what facilities are in place to facilitate automated download of such data from the platform
- where gas flow data at relevant points is being aggregated or relevant points are exempted from providing this data, both in accordance with the Regulation

## Which elements of the plan should be displaced?



Q3: Are the objectives and deliverables associated with each plan realistic?				
YES	<del>O</del>			
Further comments				

ENTSOG encourages stakeholders to provide any additional feedback on any of the plans to help us in shaping the development of all our processes.

ENTSOG welcomes comprehensive feedback as critical part of ENTSOG Work Programme and appreciates your effort and time spent to complete this form.