

(refined) Draft Network Code on Balancing – stakeholder support process

SSP Response Sheet

Please complete the fields below and send via email using the subject title, “Response to the BAL NC SSP” to info@entsog.eu by 28 September 2012.

Name

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Countries in which your organisation operates: Greece

How would you describe your organisation?

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

Question 1: Do you consider that the network code development process carried out by ENTSOG was appropriate, given the boundaries of the framework guideline? In particular, was the level of stakeholder engagement appropriate? If there is room for improvement, please inform us about possible suggestions for improvement.

Yes	<input checked="" type="checkbox"/>	No
Comments: We believe that the whole process was suitable for the code's development. We also consider that the stakeholders' engagement contributed a lot to this development while the level was appropriate.		

Question 2: Please complete the table below, indicating whether you support the relevant sections of the Draft Network Code on Balancing, having regard to the process carried out and ENTSOG's aim to reflect the views of the majority of users during the development process.

Chapter	I: General Provisions	II: Balancing System	III: Cross-border Cooperation	IV: Operational Balancing
Support	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Do not support				

Chapter	V: Nominations	VI: Daily Imbalance Charge	VII: Within-day Obligations	VIII: Neutrality Arrangements
Support	X	X	X	X
Do not support				

Chapter	IX: Linepack Flexibility Service	X: Information Provision	XI: Implementation, Interim Steps
Support	X	X	X
Do not support			

Please provide brief reasoning for your responses, if you wish.

Since DEPA is a gas company in an area with low liquidity (south-east Europe), we believe that TSOs' cooperation to create cross-border balancing zones in regions like ours is essential in order to achieve the integration of the markets. Referring to within-day obligations we also support the view that the users are more able to comply with these only if sufficient level of information is provided to them by the TSOs. Finally, we believe that linepack could be primarily used for the system balancing minimizing the WDOs for the users.

Question 3: Do you believe that the eventual implementation of the refined draft Network Code will enhance the functioning of the internal gas market?

Yes	X	No
Comments: We suppose that there will be a kind of minimum synchronization on the implementation of the codes under development (CAM, balancing, interoperability) because of their interrelation.		