

## Responses to Consultation on Draft Code on Balancing

Please complete the fields below and send via email using the subject, Response to Consultation on the Draft Code on Balancing, to [info@entsog.eu](mailto:info@entsog.eu) by 17:00CET on June 12<sup>th</sup>.

Please note that respondents are not required to respond to all questions below.

In sending your response submission by email, you are confirming that ENTSG can disregard any standard e-mail text about not disclosing email contents and attachments.

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**ENTSO-G seeks to publish response once the consultation has ended. Please indicate here whether your response is confidential (in whole or part)**

☐ In whole, meaning nothing to be published

☐ In part, meaning a version with your marked confidential sections excised by ENTSOG could be published

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

Response:

OGP agrees that the implementation of a Virtual Trading Point via the inclusion of the Trade Notification and Allocation scheme in the Balancing Network Code is essential to the delivery of a properly functioning market.

**Question 2** – in the context of the proposed Trade Notification and Allocation scheme, does the Draft Code provide sufficient harmonisation within? If not, what would be the preferred basis for any additional harmonisation?

Response:

We understand that the term “Trade Notification” refers to the nomination of gas quantities exchanged at the Virtual Point, and suggest to include a definition for this term in Appendix 1. We would welcome further harmonisation of the Trade Notifications such that daily notification quantities and hourly notification quantities are made compatible. Such a solution could be that for hourly notification quantities also an end-of-day notification is generated, and for daily notification quantities also 24 (equal) hourly quantities are generated. A further suggestion is to allow for Trade Notifications to be made after the day, but prior to final allocation, to allow for users to trade imbalances after the Gas Day has ended.

## **CHAPTER III. CROSS-BORDER COOPERATION**

**Question 3** - Do you agree that ENTSOG should issue the review of the progress of harmonisation of balancing rules report at the latest two year after the implementation of the network code and then biannually thereafter? If not, please propose an alternative and provide justification to support your proposal (and /or counter Draft Code’s approach).

Response:

OGP agrees with the proposed timing of the ENTSOG review of the progress of harmonisation.

**Question 4 – Do you agree with the proposed review process (including the issuing of a report (in the public domain)? If not, please propose an alternative and provide justification to support your proposal (and /or to counter Draft Code’s approach).**

Response:

We support the ENTSOG review process as described in Article 11 of the Draft Code.

#### **CHAPTER IV. OPERATIONAL BALANCING**

**Question 5 – Do you agree that TSOs should, under specific circumstances, be allowed to trade in adjacent markets? If so, please explain under what circumstances.**

Response:

OGP believes that trading by TSOs in adjacent markets should only be allowed as an interim measure for a short period of time under specific circumstances. These circumstances could be lack of a trading platform or balancing platform, while there is a well-functioning trading platform in the adjacent market. By trading in the adjacent market, the TSO would avoid having to contract balancing services.

However, trading by TSOs in adjacent markets might delay the development of a trading platform in the home market and would not generate the desired price signals.

Finally we believe it is up to the market to bring flexibility from adjacent markets to the TSO when there are incentives to do so.

**Question 6 – Do you agree that the use of the expression ‘economic and efficient’ is a suitable criterion assessing TSO Balancing Actions? If not, please provide an alternative and an associated rationale.**

Response:

We agree that the TSO balancing actions should not only be selected based on the lowest price. We propose an approach which prioritises the use of short term products to develop liquidity, but also takes into account the cost criterion when cost differentials become extremely high. As such the expression ‘economic and efficient’ is a suitable expression as it includes both cost and trading facilitation criteria.

We believe that – in most of the cases – it will be more efficient to use (a combination of) Title Market Products compared to using Temporal Market Products. Therefore, the Code should clearly specify that TSOs should be allowed to use Temporal Market Products only when a combination of Title Market Products would be much more expensive to use.

**Question 7 – Do you agree with the choices in the Draft Code: (1) to limit standardised**

products for trading flexible gas to short-term products; and (2) to have only a small number of short-term standardised products? If not, please explain why.

Response:

Yes, we agree with both choices. When TSOs use a small number of short-term standardised products for their balancing actions, this will promote the functioning of the short-term market, and trigger network users to trade their imbalances using the same standardised products.

**Question 8** – Do you agree that the Balancing Network Code should not prescribe exchange-based trading for the TSO and to leave this to the discretion of the TSO and the TPO? Should the network code provide criteria and factors to consider for the TSO to use an exchange based trading?

Response:

We agree that the Balancing Network Code should not prescribe exchange-based trading for the TSO. We believe the expression 'economic and efficient' (as referred to in Question 6) is a suitable criterion to assess TSO Balancing Actions, including the use of exchange based trading or not.

**Question 9** – Do you agree with the current level of services to be provided by a Trading Platform specified in the Draft Code? For example, the STSPs make no reference to a block size, meaning that this will be agreed on a local basis. If not, please explain where and why additional specification is needed.

Response:

We agree with the level of detail in the Draft Code to specify the Trading Platform services. Additional specifications, such as block size, will need to be agreed and we would welcome further harmonisation, but these details do not have to be specified within the Network Code.

**Question 10** – Do you agree with the current level of specification in the Draft Code on contractual structure and arrangements between the different parties? What changes (if any) would you advocate?

Response:

Yes.

**Question 11 – Do you agree with the choices in the Draft Code to put the obligation to (re)nominate on the Originating Party? If not, what would your preferred alternative be and what benefits would this alternative have over the mechanism proposed in the Draft Code?**

Response:

Yes, we agree that where a locational product is traded the obligation to (re-)nominate is put on the originating party.

It should be taken into account that the originating party to a locational trade may want to make further re-nominations at that point as result of subsequent trades. Therefor we suggest that a locational trade puts the obligation on the originating party to flow at least the amount of the trade.

**Question 12 – Do you concur with the sequence of the tools in the merit order and the level of guidance it gives the TSO in choosing the most appropriate tool? If not, which changes, if any, would you advocate and why?**

Response:

We agree with the sequence of the tools, but believe the Network Code should clearly distinguish between the procurement of Balancing Services (Article 16) and the actual use of Balancing Services in the merit order (Article 13). Also Article 13 of the Code should be more specific such that it is clear that TSOs apply the merit order:

*“Subject to the principles set forth in Item 4 Article 12 and without prejudice to Article 16, when deciding on the appropriate Balancing Actions to undertake, the TSO shall apply the following merit order:*

- 1. The TSO shall use Title Market Products over any other available Short Term Standardised Products.*
- 2. The TSO shall 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.*
- 3. The TSO shall 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 and (i) this requirement cannot be met by using a combination of Title Market Products or (ii) the use of a combination of Title Market Products would be significantly more expensive..*
- 4. The TSO shall use Balancing Services.”*

**Question 13 – What is your view on: (1) the criteria to be considered by the TSO when procuring Balancing Services; and (2) the gradual reduction of the use of Balancing Services**

as the liquidity of the wholesale market increases? Please provide a reasoned response.

Response:

With respect to the first criterion we note that procuring balancing services will have a negative effect on the liquidity of the wholesale market because the TSO will reserve a specific tool for its balancing needs and cause this tool to be removed from the wholesale market. On the other hand when the TSO would use the wholesale market for its balancing needs this would increase the liquidity of the wholesale market.

We accept that balancing services might be needed in specific situations, e.g. on a market in transition where the short term wholesale market may not provide sufficient flexibility to balance the system, and when locational or temporal locational products would be needed frequently. These would be covered by the criteria in the Draft Code.

We agree that TSOs should procure balancing services in a transparent and non-discriminatory manner, using market based mechanisms. Balancing services should be contracted for a maximum contract term of one year.

We support an annual review of the use of balancing services, and the aim to gradually reduce the use of balancing services.

**Question 14 – Do you agree with the proposal that the TSO shall be enabled to submit an incentive mechanism to the NRA for approval? If not, please explain why.**

Response:

We agree with the concept of an incentive mechanism but believe this should best be proposed by the NRA. Following stakeholder consultation the incentive mechanism should be approved by the NRA.

**Question 15 – Do you consider that the procedures set out in the Draft Code (excluding timing, which is covered below) for the submission of nominations and re-nominations, and the criteria for their rejection, are reasonable? If no, please present and justify your preferred alternative.**

Response:

We welcome the provisions on nominations and re-nominations as part of the balancing network code. We would like to take this a step further and also specify in the balancing network code harmonised rules for dealing with hourly nominations on one side of an interconnection point and daily nominations on the other side. Although we question the viability of a system with hourly nominations on one side and daily nominations on the other side of an interconnection point, it is essential that the nominations rules are the same on both sides as nominations on both sides have to be matched. This issue is too important to be left unresolved as proposed in Article 22.

With respect to the criteria for rejection of nominations and re-nominations, we consider the criteria under Article 23 (1) i c), Article 23 (1) i d), Article 23 (1) ii a) and Article 23 (2) to be unclear.



We would prefer that the Default Nomination Rule mentioned in Article 20 (5) is the same at all interconnection points, preferably the lesser-of-rule, and that this is specified in the balancing network code.

## **CHAPTER V. NOMINATIONS**

**Question 16 –** Do you agree with the schedule for initial day-ahead nominations set out in the Draft Code? If not, please give a reasoned alternative schedule.

Response:

We agree.

**Question 17 –** Do you agree with the schedule for re-nominations set out in the Draft Code? If not, please give a reasoned alternative schedule.

Response:

We agree with a maximum lead time for re-nominations of 2 hours. We suggest that users are allowed to enter re-nominations immediately after the Nomination Deadline has passed, and TSOs take the last re-nomination received into account in the first re-nomination cycle.

**Question 18 –** What are your initial views on these specific features on nominations (respectively re-nominations) for transition, system integrity and daily-hourly regimes of the network code? Please provide a reasoned response.

Response:

See the response to Question 15 on daily-hourly regimes.

The Network Code should specify a maximum duration for the transitional measures referred to in Article 25.

## **CHAPTER VI. DAILY IMBALANCE CHARGES**

**Question 19 -** Do you support the Daily Imbalance Quantity determination proposed in the Draft Code? If not, please indicate your preferred approach and supply further rationale and evidence of the benefits of Daily Imbalance Quantities being derived on information based during the Gas Day?

Response:

Yes.

**Question 20** – Do you have alternative views as to whether Locational and/or Temporal Market Products should feed into the derivation of the Weighted Average Price? If so what is your rationale for a different approach and what do you see as the benefits?

Response:

No.

**Question 21** – Do you agree that day-ahead trades should feed into the determination of the Weighted Average Price, Marginal Buy Price and Marginal Sell Price? If so, then under what circumstances should they be used? Is there merit in allowing local discretion as to whether day-ahead trades influence the setting of the prices?

Response:

The imbalance charges should be based on the marginal price to buy or sell balancing gas. Because balancing actions by network users and TSOs primarily take place during the day, only within-day trades should feed into the determination of the imbalance prices.

**Question 22** – Do you agree that the source of trades should be left to local discretion? What criteria should apply? Should there be an aspiration that the source of trades should be a single platform and if so why and how should the platform be determined? Please provide a rationale for your preferences.

Response:

The trades that feed into the determination of the imbalance prices should be either from a trading platform or from a balancing platform. Bi-lateral OTC trades do not pass the transparency test and should not be used.

**Question 23** – What should the effect of the small adjustment be: to encourage trading or to be sufficiently large to reflect a value for physical flexibility?

Response:

The small adjustment should be set to encourage trading. For this it would be sufficient to slightly exceed the transaction costs for using the trading platform. We suggest that a cap for the small adjustment is fixed in advance e.g. at (no more than) 2% of the average gas price for the preceding year.

**Question 24** – Do you agree with the addition of cross border trade as a criterion to the derivation of the Small Adjustment? Are the criteria sufficient? If not, what else should be added? Please justify any proposals.

Response:

The small adjustment may have an impact on cross border trade when it could trigger trades only based on the different 'small' adjustments in adjacent balancing zone. This issue could be minimised



by setting a cap for the small adjustment as suggested in the response to Question 23.

## **CHAPTER VII. WITHIN-DAY OBLIGATIONS**

**Question 25 – In your view, are the elaborations of the criteria in the Draft Code sufficient? If not, please indicate which ones and how.**

Response:

The Framework Guideline on Gas Balancing allows TSOs to include WDOs in their balancing regimes, subject to NRA approval and provided that the criteria laid down in the Framework Guideline are met. Whilst we recognise the potential need for WDOs in some TSO systems, we are concerned about the possible proliferation of different forms of WDOs and the adverse effect this would have on an integrated gas market across Europe.

OGP believe the Network Code should provide guidance about the prerequisites that have to be put in place for certain types of WDOs to meet the criteria laid down in the Framework Guideline. WDOs should not place additional constraints on network users, but should provide incentives to trigger a within-day response from those network users that can and wish to respond. Network users that respond to these within-day incentives either reduce their imbalance exposure, or benefit by selling balancing products. Users that do not meet the WDOs should be subject to charges in case their behaviour has caused the TSO to take balancing actions during the day in order to ensure system integrity.

The Network Code should seek to harmonise the requirements that WDOs place on the timing, frequency and quality of information provision, and on the lead times for re-nominations and confirmations. Before hourly matching obligations can be introduced, network users should be provided with near real-time information about their own balancing position as well as on the system's balancing status, and re-nomination lead time should be 30 minutes maximum. When this would not be supported on cross-border points, it would effectively restrict cross-border trade and not satisfy the criteria of the Framework Guidelines.

**Question 26 – Do you believe that additional criteria for assessing WDOs are warranted? If yes, please specify which and why.**

Response:

No.

**Question 27 – Do you find the respective roles of a TSO and relevant NRA(s) appropriate in the approval of any WDOs? If not, please explain why and how you would re-define the roles.**

Response:

With respect to Article 34 (2) we suggest that the NRA is obliged to issue a decision on the proposed WDO within six months, but failing to meet this term should not be construed as approval.

**Question 28** – Do you agree that a six-month period is appropriate for a TSO to make a proposal for approval of an existing WDO, including a recommendation document? If not, please propose an alternative and provide justification.

Response:

Yes.

**Question 29** – Do you agree that a six-month period is appropriate for the NRA to conduct its assessment and approval process? If not, please propose an alternative and provide justification.

Response:

Yes, taking into account that the review process should include stakeholder consultation.

## **CHAPTER VIII. NEUTRALITY ARRANGEMENTS**

**Question 30** – In your view, is the scope of the currently proposed neutrality section of the Draft Code appropriate? If not, please explain why.

Response:

We believe the provisions of this chapter should be more specific. The current text accommodates many different systems and we would welcome more harmonisation. The Supporting Document contains some good concepts that should be included in the Code. The Network Code should specify that neutrality charges are settled on a monthly basis, that charges are attributed to network users based on the actual flows (not on capacity held) and when separate neutrality pots are used.

**Question 31** – Do you find appropriate the proposed scope of the transparency elements of neutrality? If not, please explain your reasons why.

Response:

It is important that neutrality charges do not come as a surprise to network users. Information held by TSOs on the build-up of the balancing neutrality charges should be published without delay and not at the same frequency as the charges are invoiced. E.g. when neutrality charges are invoiced on a monthly basis, the TSO should publish the status of the different neutrality pots on a daily basis.

**Question 32** – Please indicate the level of granularity you would expect in the context of the breakdown of net Balancing Neutrality Charges cash-flows from both a temporal (e.g. daily, monthly, annual) and cost/revenue element split.

Response:

End-of-day reporting of cost elements and revenue elements in the different neutrality pots would be appropriate.

**Question 33** – Do you agree that there would be potential benefits of attributing Balancing Neutrality Charges to different pots and of recovering them over different classes of

network users? If yes, please explain why.

Response:

To the extent that balancing cost and/or revenue can be clearly allocated to different classes of network users, different neutrality pots should be used to avoid undue cross-subsidies and to incentivise network users. This principle should be included in the Network Code.

We believe this principle could be applied to network users that are subject to WDOs and also to NDM Offtakes when Variant 2 is applied. Variant 2 is explicitly addressed in Chapter IX (Information Provision) and hence should also be explicitly addressed in Chapter VIII (Neutrality Arrangements). The Neutrality Arrangements in the Network Code should be more specific, but as the decision to apply WDOs and/or Variant 2 is subject to approval at national level and after stakeholder consultation, this approval process should also decide on the specific neutrality arrangements that apply to WDOs and/or Variant 2.

**Question 34 – If you support multiple neutrality pots, how would these be defined? How could such different attribution processes be applied in practice?**

Response:

In case Variant 2 is applied, 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, if only because of inaccuracies in the day-ahead forecast. These actions can and should be separated from balancing actions taken by the TSO for IDM and DM Offtakes, as those actions should match with the end-of-day imbalances.

**Question 35 – Is the level of specification in the Draft Code for cash-flow management appropriate? If not, how do you propose it be amended?**

Response:

No, cash-flow management is mentioned in the Supporting Document but not addressed in the Draft Code. We accept that financing costs related to TSO balancing actions – if any – should feed into the neutrality arrangement but this should be made explicit in the Code. With respect to Article 38 (3) we believe it would be more appropriate to address default in payment in Chapter VI (Daily Imbalance Charges) and not under neutrality.

**Question 36 – An alternative to creating additional costs for invoicing systems and processes is to address neutrality sums via adjustment to transmission charges. Do you agree with such an alternative? If not, please explain why.**

Response:

No, neutrality charges should be allocated to users based on the actual gas flows and not on the basis of transport capacity held. Also it would be difficult to manage separate neutrality pots if the neutrality charges would be settled via adjustment to transmission charges. Finally, TSOs should anyhow create invoicing systems for charging the daily imbalance charges and these should be able

to address neutrality payments.

## **CHAPTER IX. INFORMATION PROVISION OBLIGATIONS**

**Question 37** – Do you agree with the information provision models for offtakes proposed in the Draft Code fulfil the requirements of the FGs? If not, please explain.

Response:

Yes, we agree with the proposed 3 models for information provision on offtakes, provided there are no WDOs in place. Information should be provided more frequently when WDOs apply in order to allow network users to comply with WDOs and this should be addressed in the Network Code. Also it should be clear that where a minimum frequency is specified in the Draft Code this shall mean that when more frequent information is available to the TSO this shall be provided to network users.

**Question 38** – Do you agree that prospective implementations of Variant 2 should be approved only after a consultation process? If not, please explain.

Response:

Yes.

**Question 39** – Do you support the additional proposal that the cost-benefit analysis (CBA) should also examine the time taken to provide information to Network Users? Are there any other features that would strengthen the CBA process and why? If so, please explain why.

Response:

We support the proposal for a cost-benefit analysis to examine the timing of information provision. The provisions on the CBA should not refer to WDOs, because more frequent information provisions are a prerequisite for WDOs to be introduced, regardless of a CBA.

**Question 40 – Do you agree that the Balancing Network Code has to provide guidance on timing of information flows? If yes, do you agree with the proposals set out? If you do not agree with the Draft Code proposals what could the alternatives be and what would be the justification?**

Response:

We agree that the Network Code aims to harmonise the timing of information flows. The general principles to apply are that information should be provided without delay at the best time(s) that enable network users to take actions to balance their portfolios.

Therefore, OGP proposes the following changes to the current proposal:

- the day-ahead NDM Forecast should be provided no later than 11:00 UTC (vs 12:00 UTC currently proposed) in order to provide network users with sufficient time to adapt to information before the Nomination Deadline (13:00 UTC);
- the initial Daily Imbalance Quantity should be provided before 12:00 UTC of Gas Day D+1. This would help network users to (i) better forecast off-takes for Gas Day D+2 before the Nomination Deadline (13:00 UTC) and (ii) better forecast off-takes for Gas Day D+1 early in the morning, in order to still have a big part of the gas day to realize balancing actions;
- delayed provision of the initial Daily Imbalance Quantity (no later than Gas Day D+3) for technical and operational reasons should be possible only under NRA approval.

**Question 41 – Do you consider that Transparency Guidelines requirements are sufficient to deal with system information? If not what should be included and what is the justification?**

Response:

The Transparency Guidelines have been applicable since March 2011 and should be sufficient to deal with system information. The first priority should be to make this information available on all systems, including system status or line pack information and real time flows.

**Question 42 – Do you agree that the proposal is in line with input information requirements set out in the FGs?**

Response:

Yes, provided no WDOs apply (see response to Question 37).

## **CHAPTER X. LINEPACK FLEXIBILITY SERVICE**

**Question 43** – Do the proposed additional criteria that a Linepack Flexibility Service has to meet complement those in the FGs to make a sufficient set of criteria? Or are additional criteria required? Please provide a reasoned response.

Response:

We support the criteria included in Article 47 of the Draft Code. Considering these conditions it is questionable whether many TSOs will be able to provide Linepack Flexibility Services. By making these services available to network user, the TSO will inevitably have to run its system within stricter operating limits. This will either lead to more TSO balancing actions or may trigger WDOs.

Since the provision of Linepack Flexibility Services is an integral part of the balancing activities of TSOs and will affect the daily imbalance charges, the neutrality mechanism should apply. For this reason we do not support Article 46 (2).

## **CHAPTER XI. IMPLEMENTATION, INTERIM MEASURES AND ENTRY INTO FORCE**

**Question 44** – How should the short-term balancing market be defined? What account of temporal and physical flow considerations needs to be made? What measures should be used to assess liquidity in the short-term balancing markets?

Response:

It is important that TSOs start using the short-term balancing market to develop liquidity in this market, and not wait until most of the liquidity parameters have been fulfilled. The concept of using the short-term market for balancing is to trigger a market response. Such a market response needs some price volatility to work. It should therefore be expected that prices for within-day gas react to the balancing status of the system.

**Question 45** – What other measures might be contemplated to enable wider access to short term gas flexibility? Are any of these approaches appropriate for inclusion in the Balancing Network Code?

Response:

Using a standard balancing product – such as the Title Product – would facilitate cross-border access to short term gas flexibility.

**Question 46** – In your view, what would justify including LNG in the Balancing Zone in “small markets” and in short term transitional arrangements? Do you see any conflict with these reasons and the BTM to be established by the eventual Balancing Network Code?

Response:

No response.



**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.**

Response:

We agree that the tolerance used should be a price based tolerance, meaning that end-of day imbalances up to the tolerance levels should be cashed out at a neutral price and should not be subject to imbalance charges. This neutral price should be the same price that is used to settle changes to network users' allocated quantities as result of the reconciliation process.

**Question 48 – In your view, should the reduced exposure involve the application of an average price? If not, please explain your rationale and provide your preferred approach.**

Response:

See response to Question 47.

**Question 49 – Do you support the Draft Code including provisions for the accuracy of forecast information provision to ensure timely phase-out of tolerances? If yes, explain how this can be best established.**

Response:

We agree that the need for tolerances is not only linked to access to flexible gas but also to the quality/accuracy of information that is provided to network users. It should be sufficient to include the timely phase-out of tolerances in the roadmap and the annual reporting on interim measures.

Tolerances should not be used to circumvent the requirement that WDOs can only be introduced when network users are provided with sufficiently accurate information in a timely manner to comply with the WDOs.

**Question 50 – Does the Draft Code provide an appropriate mitigation of risk involved in servicing NDM demand? If not, please indicate an alternative approach and its rationale.**

Response:

Network users servicing NDM demand that succeed in matching the latest NDM derived forecast could still be exposed to marginal buy/sell prices when the NDM final allocation would be different from the latest forecast. This risk could be mitigated by using a neutral price for this exposure.

**Question 51 – Do you agree that the Draft Code provides an adequate basis to support the release of surplus TSO flexibility as a stimulus to the market? If not, please explain why.**

Response:

Yes.

**Question 52 –** Do you agree that there is merit in including a reference to Balancing Platform trades in the interim imbalance cash-out price determination part, as suggested in the Draft Code? If yes, how should the approach be formulated and what merits would it have?

Response:

We agree that a reference to balancing platform trades is included in the interim imbalance cash-out price determination as proposed in Article 51 (4) of the Draft Code.

**Question 53 –** Are there any other interim steps that should be considered beyond those envisaged in the table above?

Response:

No.

**Question 54 –** Are there any specific ENTSG monitoring and reporting activities that should be explicitly captured in the Balancing Network Code. If so, please identify them and their rationale.

Response:

No.

## GENERAL ISSUES

**Question 55 –** Do you consider that the level of detail in the Draft Code, as it has been tailored according to the topics treated, is appropriate for EU legislation? If not, please explain why with reference to specific topic chapters (articles, paragraphs, etc.).

<b>CHAPTER I. GENERAL PROVISIONS</b>	Appropriate level of detail
<b>CHAPTER II. BALANCING SYSTEM</b>	Prefer more harmonisation of trade notifications and default rule.
<b>CHAPTER III. CROSS-BORDER COOPERATION</b>	Appropriate level of detail
<b>CHAPTER IV. OPERATIONAL BALANCING</b>	Appropriate level of detail
<b>CHAPTER V. NOMINATIONS</b>	Rules on daily-hourly regime (Article 22) should be more specific.
<b>CHAPTER VI. DAILY IMBALANCE CHARGES</b>	Appropriate level of detail
<b>CHAPTER VII. WITHIN-DAY OBLIGATIONS</b>	Rules are too much procedural, should be more specific with aim to harmonise rules for WDOs.
<b>CHAPTER VIII. NEUTRALITY ARRANGEMENTS</b>	Should be more specific. Should address when multiple neutrality pots should be used.
<b>CHAPTER IX. INFORMATION PROVISION OBLIGATIONS</b>	Appropriate level of detail.
<b>CHAPTER X. LINEPACK FLEXIBILITY SERVICE</b>	Appropriate level of detail.
<b>CHAPTER XI. IMPLEMENTATION, INTERIM MEASURES AND ENTRY INTO FORCE</b>	Appropriate level of detail.

**Question 56** – After reviewing and/or replying to Chapter 5 which follow, do you find that there are other material issues that ENTSOG should consider as it develops the Balancing Network Code?

Response:

No.

**Question 57** – Do you find that this supporting document for the public consultation was ‘respondent-friendly’ in terms of its readability, style, etc.? Please explain how we can improve future consultations.

Response:

We have appreciated the supporting document as a form of explanatory note to the Draft Code that provides insight into the considerations that led to the network code.