

Report on the Stakeholder Support Process

for the

refined draft Network Code on Gas Balancing

of Transmission Networks

Please note: The opinions expressed in this document are those of respondents to the stakeholder support process on the draft Network Code on Balancing and not those of ENTSOG.

Executive summary

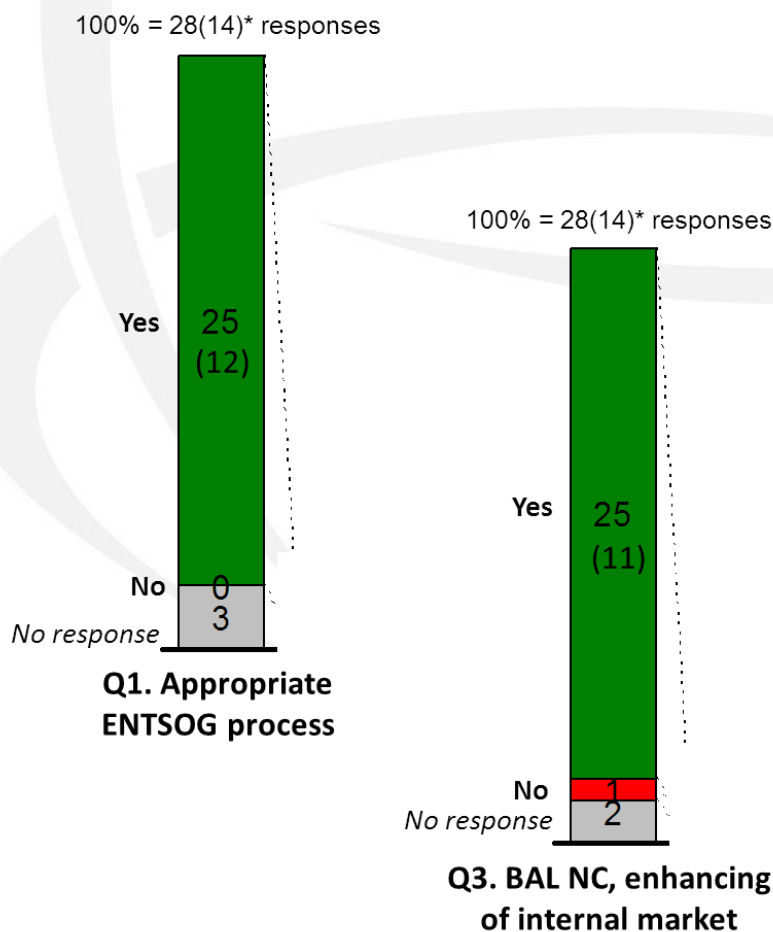
Stakeholders were asked during the Stakeholder Support Process (SSP) whether they were able to support the draft Network Code on Gas Balancing of Transmission Networks (the ‘draft Network Code’) as published by ENTSOG on 13 September 2012 and the process used to develop it.

ENTSOG received 28 SSP responses, 14 of which came from national or European trade associations.

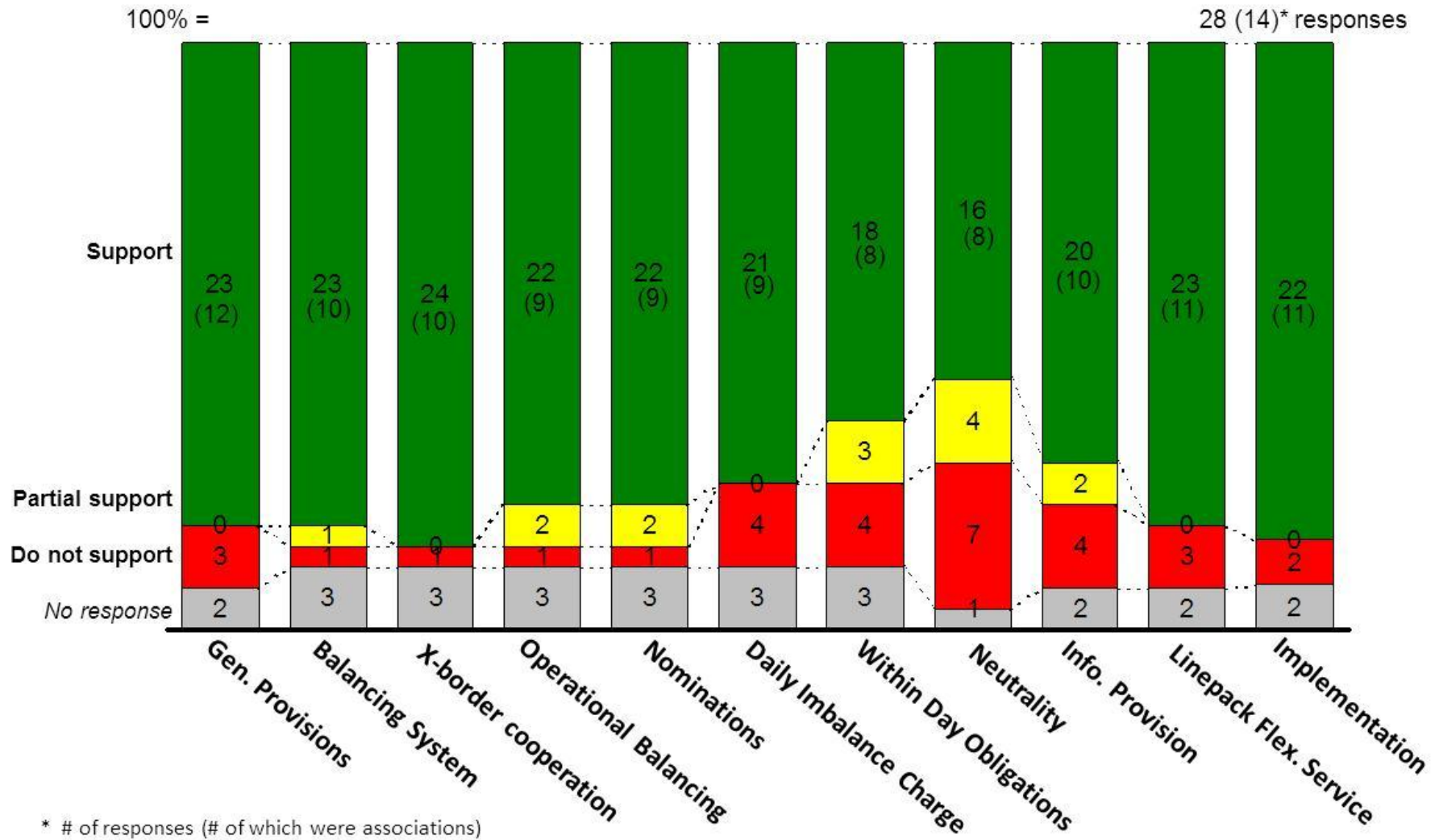
ENTSOG was recognised for running an open and responsive process and for the very high degree of stakeholder engagement which took place throughout the draft Network Code development [see figure below].

Overall, the responses indicate that the draft Network Code is well supported by the market. Some stakeholders, however, have remaining concerns about specific aspects of the draft Network Code and explained why they could not support it in full or in part [see figure on next page].

There was near unanimous support for the view that the harmonised balancing regimes to be instituted by draft Network Code will enhance the functioning of the internal gas market [see figure below].



* # of responses (# of which were associations)



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A. Context

On 14 September 2012, ENTSOG published its draft Network Code and supporting documentation and launched the SSP in which users were asked whether they were able to support the proposed draft Network Code and the process used to develop it. The SSP closed on 28 September 2012.

This report summarises the responses received to the SSP, and is intended to inform the ENTSOG General Assembly's decision on the approval of the draft Network Code. No responses were marked as confidential; therefore, the full responses themselves are available on the ENTSOG website.

Respondents' views are set out as they were provided to ENTSOG. This report does not offer ENTSOG's view on the merits of these arguments.

B. Detailed views of respondents

Key: # of respondents (# of which are associations)

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.

25(12)	Support
0	Do not support
3(2)	No response

All respondents held the view that the network code development process that ENTSOG conducted was appropriate. Stakeholders commended ENTSOG for conducting the process to a high standard, ensuring a high level of transparency and stakeholder engagement. In particular, ENTSOG’s cooperation with distribution system operators (DSOs) was seen as constructive. The web-streaming of stakeholder workshops was greatly appreciated by stakeholders who were unable to travel. ENTSOG’s outreach to stakeholders in the Central and Eastern Europe was also noted.

Question 2: Please complete the table below, indicating whether you support the relevant sections of the refined 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.

Note: Respondents were asked to indicate whether or not they supported the NC and development process. No “Partial support” option was given. Nevertheless, some respondents took the opportunity to express partial support and these responses are noted here.

	I: General Provisions	II: Balancing System	III: Cross-border Cooperation	IV: Operational Balancing
Support	23(12)	23(10)	24(10)	22(9)
Partial support	0	1(0)	0	2(1)
Do not support	3(1)	1(1)	1(1)	1(1)
No response	2(1)	3(3)	3(3)	3(3)

	V: Nominations	VI: Daily Imbalance Charge	VII: Within-day Obligations	VIII: Neutrality Arrangements
Support	22(9)	21(9)	18(8)	16(8)
Partial support	2(1)	0	3(1)	4(1)
Do not support	1(1)	4(2)	4(2)	7(4)
No response	3(3)	3(3)	3(3)	1(1)

	IX: Information Provision	X: Linepack Flexibility Service	XI: Implementation, Interim Steps
Support	20(10)	23(11)	22(11)
Partial support	2(0)	0	1(0)
Do not support	4(2)	3(1)	2(1)
No response	2(2)	2(2)	3(2)

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

25(11)	Yes
1(1)	No
2(2)	No response

There was a general consensus among stakeholders that harmonised balancing regimes will contribute to further market integration and that the implementation of market-based mechanisms instituted by the Network Code could play an important role in the development of liquidity in the European market(s).

C. Summary of responses by respondent

Organisation/Company	Org	1a	I - GenProv	II - Bal Sys	III - CBC	IV - Op Bal	V - Noms	VI - DIC	VII - WDOs	VIII - Neutr	Info	LFS	XI - Impl	3a
BDEW e.V.	A	Y	S	S	S	S	S	S	S	DNS	S	S	S	Y
Cedec	A	Y	S	S	S	S	S	S	S	S	S	S	S	Y
Centrica		Y	S	S	S	S	S	S	S	S	S	S	S	Y
DEPA S.A.		Y	S	S	S	S	S	S	S	S	S	S	S	Y
E.ON AG		Y	DNS	S	S	S	S	S	DNS	S	S	S	S	Y
EDF		Y	S	PS	S	PS	PS	DNS	PS	PS	PS	S	PS	Y
Edison		Y	S	S	S	S	PS	S	PS	PS	S	PS	S	Y
EDP Group		NR	S	S	S	S	S	DNS	NR	DNS	DNS	DNS	DNS	Y
EFET	A	Y	DNS	S	S	S	S	S	DNS	S	S	S	S	Y
EnBW		Y	S	S	S	S	S	S	DNS	S	S	S	NR	Y
Energie-Nederland	A	Y	S	S	S	PS	1	S	S	S	S	S	S	Y
ENI		Y	S	S	S	S	S	S	S	S	S	S	S	Y
Eurelectric	A	Y	S	S	S	S	PS	S	PS	PS	PS	S	S	Y
EUROGAS	A	Y	S	S	S	S	S	S	S	S	S	S	S	Y
Eurogas Distribution Committee	A	Y	S	NR	NR	NR	NR	NR	NR	S	S	S	S	Y
Europex	A	Y	S	S	S	S	S	S	S	S	S	S	S	Y
ExxonMobil International		Y	S	S	S	S	S	S	S	S	S	S	S	Y
Fachverband Gas Wärme	A	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
GA-MA AD Skopje		Y	S	S	S	S	S	S	S	S	S	S	S	Y
GasTerra B.V.		Y	S	S	S	S	S	S	S	PS	S	DNS	S	Y
GDF Suez		Y	S	S	S	S	S	S	S	DNS	DNS	S	S	Y
GEODE	A	NR	NR	NR	NR	NR	NR	NR	NR	DNS	NR	NR	NR	NR
IFIEC Europe	A	Y	S	S	S	S	S	DNS	S	S	DNS	S	S	Y
OGP Europe	A	Y	S	S	S	S	S	S	S	S	S	S	S	Y
RWE Supply & Trading GmbH		Y	S	S	S	S	S	S	S	S	S	S	S	Y
VKU e.V.	A	Y	S	S	S	S	S	S	S	DNS	S	S	S	Y
VOEG (Vrijhandels Org. voor Elektriciteit en Gas)	A	Y	DNS	DNS	DNS	DNS	DNS	DNS	DNS	DNS	DNS	DNS	DNS	N
WINGAS GmbH		Y	S	S	S	S	S	S	S	DNS	S	S	S	Y

A = Association (national or EU-level)

S = Support

DNS = Do not support

NR = No response

Y = Yes

N = No