

Network Code Interoperability and Data Exchange Rules 2nd Stakeholder Joint Working Session

Brussels – 28 Nov 2012



Network Code Interoperability and Data Exchange Rules 2nd Stakeholder Joint Working Session

28 November 2012 at Thon Hotel EU in Brussels

Welcome





Network Code Interoperability and Data Exchange Rules 2nd Stakeholder Joint Working Session

Panagiotis Panousos

Business Area Manager, System Operation

Brussels – 28 Nov 2012

Introduction to 2nd SJWS

- Kick-off workshop 26th Sep:
 - ≈80 participants ۲
 - Presented material & notes published
- **Project Plan consultation:**
 - 37 responses received ۲
 - Non-confidential responses & report published •



1st SJWS

- 79 participants •
- Presented material & notes published
- 2nd SJWS
 - Agenda & pre-reading material published
- 3rd SJWS
 - Registration is open (till 7th Dec)



Publications

Press Releases

cedures

Operation

Transparency

Syster

Statutes



Outlook NC INT Development Process

Stakeholder engagement **ENTSOG Member work Consultation (1 Month)** Sep 2012 Kick-Off Kick-Off WS: 26 Sep **Project planning and launch** Oct Nov **SJWS 1: 14 Nov SJWS SJWS 2: 28 Nov** Dec Interactive draft network code SJWS 3: 11 Dec JUVVJ development Jan Feb **Consultation (2 Months)** Mar Workshop **Consultation WS: 20 Mar** Apr May **Network Code refinement Conclusion WS: 28 May** Workshop Workshop **Stakeholder support process** Aug **Network Code finalisation** Sep 2013

NC development process: actual state



NC development process: upcoming activity





Code development – from topic to draft text



SJWS1 – input received

- > Gas Quality and Odourization:
 - How CEN standards will become binding? Role Member States.
 - End–users: it is important to receive information on WI and GCV variations
 - Relevance of Long Term Monitoring?
 - Odourization: changing practices is MS responsibility (safety issue)
- Interconnection Agreements:
 - More transparency in developing/amending IA's
 - Impact Bundled products (Matching, ...) to be clarified. Procedures to be defined based on bundled products
 - OBA as preferred allocation rule ?
 - List of standards for measurement principles



Structure of event

AGENDA



* EC is considering making use of its right of proposal to put forward a text for comitology in NC CAM.



Objectives of SJWS

"The SJWS are working sessions which will enable exchange and development of ideas for inclusion in the network code. During this phase of the network code development activity ENTSOG envisages wide interaction with all participants."

Detailed thoughts and positions are to be discussed during the 3 SJWS

IMPORTANT STAKEHOLDER INVOLVEMENT -> REFINEMENT DRAFT BUSINESS RULES



Thank You for Your Attention

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2nd Stakeholder Joint Working Session

Jef De Keyser, ENTSOG Yvette Jones, Gaslink Dirk Serruys, Fluxys Daniele Mazzotti, SNAM Colin Hamilton, National Grid Brussels – 28 Nov 2012

Data Exchange - Agenda

1. Introduction: Data Exchange and Business Processes

- 2. Data Exchange Network code development
- 3. Data Exchange Solutions
- 4. Selection criteria for Data Exchange solution
- 5. Implementation Roadmap
- 6. Questions & Answers



INTRODUCTION: Scope of Network Code INTEROPERABILITY

• Covered by this Network Code

1. Data Exchange:

→Define the HOW = define the communication types between TSOs and their Counterparties

2. Interoperability:

Define the WHAT for the INT business process(es)
Identify the data that have to be exchanged for the Matching process

 This Network Code is the technology basis for the development of the Data Exchanges for the other network codes (CAM, BAL, ...)

Proposed development process for Data Exchanges of other NCs:

• Define communication requirements



INTRODUCTION: WHAT & HOW





Proposal – Development process for Data Exchanges



Example of BRS (Business Requirement Development CAM)

1. Data solution development: Business Process Model

(Actors, Systems, Use Case Diagram)



Example of BRS (Business Requirement Development CAM)

2. Data solution development: Business Requirements (use case)

Determine the capacity that is presented to the market for auction.



Example of BRS (Business Requirement Development CAM)



Example of BRS (Business Requirement Development CAM)



Example of BRS (Business Requirement Development CAM)



Example of BRS

- 6. Next steps
- Develop the detailed message specifications (ENTSOG & EDIGAS WG)
- Add implementation details
- Produce a complete Implementation Guideline
- Validate the Implementation Guideline (ENTSOG + Stakeholders)
 - Publish draft version
 - Stakeholder session with presentation & feedback
 - Update Implementation Guideline (review if required)
- Publish the implementation Guideline
 - General overview
 - Functional definition
 - Workflow scenarios
 - References
 - Information model
 - XML implementation
 - Document change log



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What is Data Exchange?

- Example 1 nomination:
 - Data Exchange is the method used by a NU to inform a TSO of the quantity of gas that he wants to transport from A to B in the network
- Example 2 capacity auction bid:

 Data Exchange is the method used by a NU to inform a Capacity Auction platform of the transport capacity he wants to buy in the network

→ Parties & Data



Reasons for harmonisation:

Operational efficiency

• Facilitate entry of new market participants

- Common technologies can be used to communicate with all TSOs in EU
- Reduction of maintenance cost
 - Reduce number of Data Exchange technologies
- More efficient use of IT staff to keep systems operational
 Improve stability and availability by focussing on one technology

 \rightarrow Harmonisation of the data exchanges

- Modeling of Business Processes
 - Same (business) rules for all users
 - \rightarrow Harmonisation of Business Rules for the same business process



Framework Guidelines

6. Data exchange

Without prejudice to existing legislation, these Framework Guidelines aim at extending harmonisation of data exchange solutions to all areas where TSOs exchange data among themselves or communicate data to counterparties.

The Network Code shall foresee a common set of data formats, data network and exchange protocol ('data exchange solution') for the **reliable, secure and smooth** exchange of information among TSOs, as well as from TSOs to relevant counterparties.

The selection of such a data exchange solution by ENTSOG shall be based on a **cost-benefit** analysis subject to **public consultation**. This analysis, as well as the subsequent **selection process** will take into account in particular the following considerations:

- > best available technologies, particularly in terms of security and reliability;
- > the actual spread (whether the solution considered is widely used) of the solutions considered;
- > the volume of data traffic required to transfer information;
- > the costs of first introduction and cost of operation;
- > the potential for discrimination of small shippers or new market entrants;
- > the synergies with current electricity data exchange rules;
- > the compatibility with counterparties' data exchange solutions.





Network code on Interoperability - Data Exchange section



Data Exchange - Scope

Without prejudice to existing legislation, these framework guidelines aim at extending harmonisation of Data Exchange solutions to all **areas** where TSOs exchange data among themselves or **communicate** data to **counterparties**.

Areas and Counterparties

Areas

To cover all data exchanges required for the Network Codes and Guidelines adopted by EC

- Communication
 - →Limited to electronic data exchanges

Counterparties

→ All parties that exchange data with TSOs



DATA EXCHANGE – Selection Process

The selection of any solution can only come after following the sequence:





Data Exchange - Agenda

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Data Exchange : ICT physical context





Data Exchange : ICT logical context





DATA EXCHANGE



Data Exchange – Framework Guidelines

The network code shall foresee a common set of **data formats**, data **network** and **exchange protocol** ('Data Exchange solution') for the **reliable, secure and smooth** exchange of information among TSOs, as well as from TSOs to relevant counterparties.








>Document based Data Exchange



File transfer between IT systems
The smallest unit of information transfer is a 'document'
Adheres to the concept of 'loose' coupling
Traceability (documents)
Typically needs translator software

> Document based Data Exchange - Solutions

 oebXML, ebMS
 oApplicability Statement 2 (AS/2)
 oApplicability Statement 4 (AS/4)



>Integrated Data Exchange



Direct exchange of information between applications
Initiator can be the sender or requestor of the information
Used for big data volumes & time critical processes
Offers flexible query possibilities

→ Frequently changing data structures



>Interactive Data Exchange



Exchanges of information based on an interactive dialog controlled by the initiator of the communication
Not suited for big data volumes
Alternative solution for small users
Big overhead and risk for human errors
Manually upload or download of files possible

>Interactive Data Exchange solution: Web browser

 Low (no) implementation cost for end-users (browser is standard offered in PC software)
 Quick set-up for operation



> Data Network

- Business requirements
 - Accessibility for all parties involved in the international gas business
 - Operator independent network connections due to the geographical spread of connected user
 - Easy and fast, flexible and worldwide accessibility
 - Reliability and up-time of the network
- Technical solutions
 Public networks
 - X25 (outdated)
 - Internet
 - OPrivate networks
 - ISDN (digital telephone lines)



> Data Formats

• Structure formats \rightarrow How the file is structured IT wise

CSV – comma separated values
 XLS files (excel)
 EDIFACT (electronic data interchange for administration commerce and transport) – UN
 XML - Extensible Markup Language

■ Content formats → How the content is organized business wise

Free text (no content structure)EDIGAS



> Data Formats – Example XML-EDIGAS format for Nomination

```
<Nomination Version="EGAS40" Release="2">
      <Identification v="NOMINT11111"/>
      <Type v="01G"/>
      <CreationDateTime v="2012-09-30T11:18:00Z"/>
      <ValidityPeriod v="2012-10-01T04:00Z/2012-10-02T04:00Z"/>
      <ContractReference v="STAIZTSHIPPERACCOUNT"/>
      <ContractType v="CT"/>
      <IssuerIdentification v="SHIPPER" codingScheme="321"/>
      <IssuerRole v="ZSH"/>
      <RecipientIdentification v="TSO" codingScheme="321"/>
      <RecipientRole v="ZSO"/>
      <ConnectionPointInformation>
             <LineNumber v="1"/>
             <ConnectionPoint v="IZT" codingScheme="321"/>
             <AccountIdentification v="AB999" codingScheme="321"/>
             <AccountRole v="ZES"/>
             <Period>
                    <TimeInterval v="2012-10-01T04:00Z/2012-10-02T04:00Z"/>
                    <Direction v="Z02"/>
                    <Quantity v="1000"/>
                    <MeasureUnit v="KW1"/>
             </Period>
      </ConnectionPointInformation>
</Nomination>
                                             ILSUY
```

> Data Formats – Example Excel format for Nomination

NOMINT	Gas Day	15.08.2013	15.08.2013	15.08.2013	15.08.2013	15.08.2013	15.08.2013
	STS (priority)						
NAD (internal shipper)		99Y-TEST13	99Y-TEST13	99Y-TEST2Z	99Y-TEST2Z	99Y-TEST21V	99Y-TEST21V
LOC (location)		99Z000000000099	99Z000000000099	99Z000000000099	99Z000000000099	99Z000000000099	99Z000000000099
	NAD (external shipper)	99Y-TEST13	99Y-TEST13	99Y-TEST2Z	99Y-TEST21V	99Y-TEST21V	99Y-TEST21V
RFF (reference)							
	QTY (direction)	Z03	Z03	Z03	Z03	Z03	Z03
	Version	1	1	1	1	1	1
	NOMRES-Revision						
	Comments						
checksum	kWh	2400000	2400000	720000	720000	480000	480000
from	until	kWh	kWh	kWh	kWh	kWh	kWh
6:00	7:00	100000	100000	30000	30000	20000	20000
7:00	8:00	100000	100000	30000	30000	20000	20000
8:00	9:00	100000	100000	30000	30000	20000	20000
9:00	10:00	100000	100000	30000	30000	20000	20000
10:00	11:00	100000	100000	30000	30000	20000	20000
11:00	12:00	100000	100000	30000	30000	20000	20000
12:00	13:00	100000	100000	30000	30000	20000	20000
13:00	14:00	100000	100000	30000	30000	20000	20000
14:00	15:00	100000	100000	30000	30000	20000	20000
15:00	16:00	100000	100000	30000	30000	20000	20000
16:00	17:00	100000	100000	30000	30000	20000	20000
17:00	18:00	100000	100000	30000	30000	20000	20000
18:00	19:00	100000	100000	30000	30000	20000	20000
19:00	20:00	100000	100000	30000	30000	20000	20000
20:00	21:00	100000	100000	30000	30000	20000	20000
21:00	22:00	100000	100000	30000	30000	20000	20000
22:00	23:00	100000	100000	30000	30000	20000	20000
23:00	0:00	100000	100000	30000	30000	20000	20000
0:00	1:00	100000	100000	30000	30000	20000	20000
1:00	2:00	100000	100000	30000	30000	20000	20000
2:00	3:00	100000	100000	30000	30000	20000	20000
3:00	4:00	100000	100000	30000	30000	20000	20000
4:00	5:00	100000	100000	30000	30000	20000	20000
5:00	6:00	100000	100000	30000	30000	20000	20000
	Sum	2400000	2400000	720000	720000	480000	480000





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Coffee break



Data Exchange - Agenda

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Data Exchange – FG – Selection of a solution

The selection of such a Data Exchange solution by ENTSOG shall be based on a cost-benefit analysis subject to public consultation. This analysis, as well as the subsequent selection process will take into account in particular the following considerations:

- best available technologies, particularly in terms of security and reliability;
- the actual spread (whether the solution considered is widely used) of the solutions considered;
- the volume of data traffic required to transfer information;
- the costs of first introduction and cost of operation;
- the potential for discrimination of small shippers or new market entrants;
- the synergies with current electricity Data Exchange rules;
- the compatibility with counterparties' Data Exchange solutions.





Evaluation Criteria



Data Exchange - Actual Spread

Data format example

Edig@s XML & Edifact

Kiss-A:



(*) Overview based on a TSO questionnaire Q2 2012



Data Exchange - Actual Spread

Communication protocols used (*)





Data Exchange - Synergies





Data Exchange – Criteria

Security & Confidentiality

- Confidentiality: Encryption of messages
- Identification of counter party (Signature of messages, user or system password,...)
- Acknowledgement of message receipt and message processing
- Non repudiation (Proof of Receipt)
- At least one message delivery



Data Exchange – Criteria

Technology <u>Technological requirements:</u>

- Performance
- Information Carrier
- Payload
- Traceability

Risk

- Expected life cycle (e.g. 10 years life cycle)
- Maturity
- Actual spread & available products on the market
- Customer support



Data Exchange – Criteria

Cost

Costs assuming to implement a solution from scratch

- Implementation
- Infrastructure
- Maintenance Cost
 - System patching
 - System upgrade
 - Configuration changes



DATA EXCHANGE- Solutions overview

		Data Content Format		Data Exchange Protocol		
Toolbox	Network	Structure Format	Content Format	B2B Standard	Communication Protocol	
Document Based DE	Private Network	CSV	Free text	AS4	HTTP(S)	
Integrated DE	Public Internet	XLS	Edig@s	AS2	(S)FTP	
Interactive DE	X25	EDIFACT		ebMS	SMTP	
	ISDN	XML		SOAP		
Solutions Stack						
		Data Content Format		Data Exchange Protocol		
Toolbox	Network	Structure Format	Content Format	B2B Standard	Communication Protocol	
				AS2		
Document based				ebMS		
Data Exchange				SOAP		
	Internet	XML	Edig@s	AS4	HTTP(S)	
Integrated DE	Internet	XML	Edig@s	SOAP	HTTP(S)	
Interactive DE	Internet	none	tbd		HTTP(S)	



DATA EXCHANGE- Solutions overview

		Data Content Format		Data Exchange Protocol		
Toolbox	Network	Structure Format	Content Format	B2B Standard	Communication Protocol	
Document Based DE	Private Network	CSV	Free text	AS4	HTTP(S)	
Integrated DE	Public Internet	XLS	Edig@s	AS2	(S)FTP	
Interactive DE	X25	EDIFACT		ebMS	SMTP	
	ISDN	XML		SOAP		
Solutions Stack						
		Data Content Format		Data Exchange Protocol		
Toolbox	Network	Structure Format	Content Format	B2B Standard	Communication Protocol	
				AS2		
Document based				ebMS		
Data Exchange				SOAP		
	Internet	XML	Edig@s	AS4	HTTP(S)	
Integrated DE	Internet	XML	Edig@s	SOAP	HTTP(S)	
Interactive DE	Internet	none	tbd		HTTP(S)	



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Migration Roadmap:

- Roadmap provides a single point of reference and a coordinated overview of different activities
- Many technologies in use: roadmap demonstrates a migration path to a common solution
- Implementation timings of solutions by TSOs shall coordinate with implementation of corresponding business processes
- Some flexibility of implementation schedules by NUs may be allowed



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Questions

- > What do you see as an **important criteria** to take into consideration for the selection of a new Data Exchange solution?
- > Do you see a problem with implementing the new communication standard within 12 months by the TSOs' Counter Parties? If so what is the timeframe you would recommend?
- > What is the level of details do you consider relevant in the Network Code?
- > Do you see a need to have more detailed technical information in order to support the implementation of the NC ?(e.g. to take into account technological evolutions)
- > How do you see the consultation process for the development of the implementation support document? (e.g. stakeholder involvement)
- > Consultation process for evolutional changes in the future



Thank you





2nd Stakeholder Joint Working Session

Stakeholders' views

Brussels – 28 Nov 2012

EFET presentation to ENTSOG SJWS2 on Data Exchange & Units Brussels, Nov 28th 2012

European Federation of Energy



Filip Sleeuwagen

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Agenda



- 1. Intro
- 2. EFET's position on:
- Data Exchange
- 3. Additional Remarks

1. Intro



- The objective is not complete but efficient harmonization
- Current ways round many of the barriers involve an additional layer of complexity or, worse still, are papering-over-the cracks to hide the differences and increase the level of unpredictable risk.
- Improved interoperability is essential if the single market is to operate efficiently with well connected balancing zones established over the whole of Europe. The forthcoming Network Code (and its Impact Assessment) should aim to help this process by **looking forward to what will be necessary in 5-10 years time** rather than relying solely on analysis the status quo.

2. EFET's Position on: Scope and Application FFET

- Interconnection Points between EU member states and between TSO systems if they are operated separately within a Member State. Optimal to extend to Interconnector Points with non-EU States if practical.
- Consistent approach for all communication protocols, processes and procedures between the user and the 'national' TSO regarding all their operations within the EU. The use of standard data formats and content needs to be specified in the Network Code.
- if DSOs, SSOs & LSOs cooperate in applying the same rules, it would enhance the FG's application and help to facilitate greater interoperability, since they are integrant part of the gas market. A pragmatic approach must be found to achieve this recognizing the implementation times involved and the need to keep the primary focus on the services provided by TSOs.

2. EFET's Position on: Scope and Application EFET

- We favour **a very high level of harmonisation** within the whole EU in order to achieve the creation of the single gas market.
- "Business as usual" is not acceptable, 'full' harmonisation is necessary for units, conversion rules and data exchange, and possibly for Odorisation depending on the resolution of current issues. A very high level of harmonisation with built-in contingency between TSOs is essential for interconnection agreements and for capacity calculation, but if these are extended to inter-governmental agreements or arrangements between TSOs and SSOs, DSOs and LSOs, then only partial harmonisation (standardised principles, local implementation) should be required for those cases
- The level of harmonisation is difficult to separate from the geographic installation scope of the Framework Guidelines.

	IAs	Units	Gas Quality	Odorisation	Data Exchange	Capacity Calculation
Full harmonization						
Partial harmonization						
Business as usual						

EFET's Position on: Data Exchange



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- Data exchange is crucial for gas trading. The more data communicated then the more cross-border trading is made efficiently. Harmonization of the data format and data content is also necessary to avoid undue discrimination between traders. Furthermore, EFET has a strong preference that the same format for Data exchange is used also by SSOs and LSOs to ensure their integration into a fully interoperable EU gas market.
- EFET is in favour of a full harmonisation process for data exchange with a standardised messaging protocol: the format of this protocol must be harmonised, but the content should be more flexible and adapted to the context.
- Capacity bookings (real and estimations), gas flows (real and estimations), actual gas quality, maintenance periods (scheduled and unscheduled) and the data required for nomination and renomination processes must all have standardized and clearly defined format and content.
- The open standard for Data exchange should define format, content and communication (messaging) protocol to standardize at maximum the processes to be implemented, minimize the implementation efforts by potentially offering a reference non-exclusive software implementation. Such data format must be maximally based on existing market data standards as currently in place for the energy community (Commodity product Markup Language CpML)
- Information disclosure on real time is essential for the EU market functioning, its liquidity and integration.
 Both the format and content needs to be standardized if data processing is to be practical and the efficiency benefits realized.
- Voluntary rules lead to interpretation and implementation variants, which increase the operational issues of such a process exponentially (e.g. difficulties in connecting the implemented process variants to TSOs,

F. Sleeuwagen operation burden to foresee reconciliations between the different variants, etc.). It is crucial to lay down all of these rules (process, content, data format and messaging/communication topics) in **strict mandatory**

3. Additional remarks



- All proposals in these Framework Guidelines that improve interoperability are welcomed, whether by bringing simplifications that reduce risk (harmonisation of units for instance) or by tackling major hurdles to cross-border trade such as odorisation. But there are other interoperability issues that may have been missed. EFET suggests to write the Framework Guideline in such a way that it allows for small but important interoperability issues to be raised during the Network Code development process.
- Harmonisation of nomination and renomination seems to have disappeared from these FG on interoperability. The lack of harmonization related to the nomination procedure as a whole (deadlines for nomination & renomination by shippers and confirmation by TSO) is an obstacle to the efficient functioning of the market, as it affects the efficient allocation and use of capacity with a direct impact on the efficiency of the gas market. We fully support the establishment of harmonised timelines for Day-Ahead and Within-Day Nomination/Renomination/Confirmation procedures.
- Whilst it is helpful that at a high level an outline standardised timeline is now proposed in the Balancing Network Code ,this does not cover all the **nomination procedures**, nor does it provide the **detailed level of harmonisation** that is required for full interoperability. It is essential that these issues are fully addressed. To the extent that this proves not to be the case in the balancing network code then the topic will need to be included in this

Questions and Answers





Thanks for your attention EFET



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Tel: +31 (0)20 5207970 Email: <u>secretariat@efet.org</u> www.efet.org **Back-up**



- EFET Gas Committee has responded to the Questionnaire
- Summary of our response :
 - We strongly support sufficient harmonization to enable efficient operation of wholesale gas trading markets throughout Europe: "what would an ISO do?"
 - Some parts of the framework guidelines on interoperability, in particular data exchange rules, will need to apply to DSOs, SSOs and LSOs.
 - Need standard units to be used for TSO communication (e.g. for information provision, capacity bookings, nominations etc.)
 - Open standard data formats, content definitions, processes and communication protocols that must be applied between TSOs, Shippers, Traders, Regulators and all relevant market participants
 - Harmonization of nomination and re-nomination processes is necessary (and will need to be in the scope if it is not in other Network


Some remarks on data exchange

Philipp Daniel Palada, ENTSOG SJWS INTER, 28 Nov 2012





The deliverables of this NC

- The scope of the NC is clearly limited to Interconnection Points, but
- It will have at least indirect impact on the data exchange of the entire market (and consequently go beyond the scope)
- The financial impacts or additional costs for non-TSO's may exceed those of the TSO's by far
- Excessive IT-requirements could act as an entry barrier,
 - existing solutions must not be devaluated,
 - data exchange harmonization requires CBA-justification





ENTSOG approach to overcome timing problem

- FG requires harmonization of Data Exchange prior to implementation of the respective business rules
 - Neither CAM/CMP nor Balancing finalized
 - Even if INTER-NC could pre-describe some procedures of these NC's a NC is too in-flexible in the fast changing environment of IT (and data exchange)
- Implementation Guideline (Handbook) best way to handle these issues (even if not legally binding)
 - NC to describe process of set up data exchange rules
 - Detailed business rules/procedures and respective IT-implementation in Implementation Guideline (Handbook)
- Stakeholder involvement key for proper implementation
 - Broad acceptance success factor
 - Envolvement not only now but during all future adjustments
 - Potential IT-investment obligations for market participants require transparent economic evaluation and transparent approval mechanisms (and consequently the right to reject proposals)



What to fix in NC and Handbook

Flexibility essential

- There are existing formats and procedures for data exchange, the proposed solution shall take into account the actual spread
- An implementation roadmap and potential exemptions needed to avoid stranded investments
- Fit for purpose solutions instead of expensive over-engineering to protect non TSO's



Data exchange

2nd Stakeholder Joint Working Session

Discussion

Brussels – 28 Nov 2012



Network Code Interoperability and Data Exchange Rules 2nd Stakeholder Joint Working Session

28 November 2012 at Thon Hotel EU in Brussels

Lunch





2nd Stakeholder Joint Working Session

Colin Hamilton, National Grid

Brussels – 28 Nov 2012

Framework Guidelines

3. Units

A lack of harmonisation with regards to the units used by TSOs along the gas value chain may constitute a barrier to cross-border trade and access to markets. The Network Code shall determine the use of harmonised units at least for energy, volume, pressure and gross calorific value, for the TSOs to use when communicating to counterparties.

Where the harmonisation of units has already been covered by EU legislation or in a Network Code adopted by ENTSOG under Art 8(2) of the Gas Regulation, the Network Code shall not duplicate these provisions, but shall introduce further harmonisation, insofar it is deemed necessary for the purposes of interoperability as defined in these Framework Guidelines.



Common set of units:

- The common units for pressure, temperature, volume, calorific value, energy, and Wobbe-index shall be:
 - Pressure

:bar

- Temperature
- 🗸 Volume
- Gross Calorific Value
- 🗸 Energy
- ✓ Wobbe-index

: °C (degree Celsius)

: $m^{3}(n)$ (at 0° C and 1.01325 bar(a))

ie : kWh/m³(n)

- : kWh (based on GCV)
- : kWh/ m³(n)(based on GCV)
- (i) For pressure, it should be indicated whether it refers to absolute (bar(a)) or gauge (bar(g)).
- (ii) Combustion reference temperature for GCV, Energy and Wobbe-index shall be 25° C.



Utilisation of Common Set of Units:

The common set of units shall at least be used for communications associated with the operational procedures and information exchange described in the European network codes between adjacent TSOs and between TSOs and other Counterparties (electronically received communications) related to transportation of gas across an Interconnection Point or in respect of the publication of data on a common platform.



Utilisation of other Units:

- The utilisation of other units in addition shall be permitted for data communication between adjacent TSOs where both parties agree and between TSOs and other Counterparties if required by national regulatory/legislative frameworks.
- Where TSOs use other units the conversion factors used shall be published by the TSO.





Questions and Answers





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- 3. Additional Remarks

1. Intro



- The objective is not complete but efficient harmonization
- Current ways round many of the barriers involve an additional layer of complexity or, worse still, are papering-over-the cracks to hide the differences and increase the level of unpredictable risk.
- Improved interoperability is essential if the single market is to operate efficiently with well connected balancing zones established over the whole of Europe. The forthcoming Network Code (and its Impact Assessment) should aim to help this process by looking forward to what will be necessary in 5-10 years time rather than relying solely on analysis the status quo.

2. EFET's Position on: Scope and Application FFET

- Interconnection Points between EU member states and between TSO systems if they are operated separately within a Member State. Optimal to extend to Interconnector Points with non-EU States if practical.
- Consistent approach for all communication protocols, processes and procedures between the user and the 'national' TSO regarding all their operations within the EU. The use of standard data formats and content needs to be specified in the Network Code.
- if DSOs, SSOs & LSOs cooperate in applying the same rules, it would enhance the FG's application and help to facilitate greater interoperability, since they are integrant part of the gas market. A pragmatic approach must be found to achieve this recognizing the implementation times involved and the need to keep the primary focus on the services provided by TSOs.

2. EFET's Position on: Scope and Application EFET

- We favour a very high level of harmonisation within the whole EU in order to achieve the creation of the single gas market.
- "Business as usual" is not acceptable, 'full' harmonisation is necessary for units, conversion rules and data exchange, and possibly for Odorisation depending on the resolution of current issues. A very high level of harmonisation with built-in contingency between TSOs is essential for interconnection agreements and for capacity calculation, but if these are extended to inter-governmental agreements or arrangements between TSOs and SSOs, DSOs and LSOs, then only partial harmonisation (standardised principles, local implementation) should be required for those cases
- The level of harmonisation is difficult to separate from the geographic installation scope of the Framework Guidelines.

	IAs	Units	Gas Quality	Odorisation	Data Exchange	Capacity Calculation
Full harmonization						
Partial harmonization						
Business as usual						

EFET's Position on: Units



- Although the current situation does not appear to be a major barrier that prevents trading
 opportunities within the more liquid markets, the use of non-standardised units, however,
 introduces unnecessary operational risk, complexity and costs to the daily activities of
 shippers and could therefore discourage new entrants or limit cross-border trading activity.
- Harmonization of units principally eases the communication among TSOs and between TSOs with other involved parties and contributes to efficient market functioning, whilst contributing positively to the management of measurements.
- EFET is in favour of full harmonisation of units (especially any units underlying capacity bookings, nominations and balancing) across Europe. Harmonisation should include all units that are used for capacity, nominations, gas flows, gas quality or balancing. Whilst extending beyond that is not necessary from a network user perspective, it would be helpful to have official naming conventions for other units and an official conversion table.

3. Additional remarks



- All proposals in these Framework Guidelines that improve interoperability are welcomed, whether by bringing simplifications that reduce risk (harmonisation of units for instance) or by tackling major hurdles to cross-border trade such as odorisation. But there are other interoperability issues that may have been missed. EFET suggests to write the Framework Guideline in such a way that it allows for small but important interoperability issues to be raised during the Network Code development process.
- Harmonisation of nomination and renomination seems to have disappeared from these FG on interoperability. The lack of harmonization related to the nomination procedure as a whole (deadlines for nomination & renomination by shippers and confirmation by TSO) is an obstacle to the efficient functioning of the market, as it affects the efficient allocation and use of capacity with a direct impact on the efficiency of the gas market. We fully support the establishment of harmonised timelines for Day-Ahead and Within-Day Nomination/Renomination/Confirmation procedures.
- Whilst it is helpful that at a high level an outline standardised timeline is now proposed in the Balancing Network Code ,this does not cover all the **nomination procedures**, nor does it provide the **detailed level of harmonisation** that is required for full interoperability. It is essential that these issues are fully addressed. To the extent that this proves not to be the case in the balancing network code then the topic will need to be included in this

Questions and Answers





Thanks for your attention EFET



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- EFET Gas Committee has responded to the Questionnaire
- Summary of our response :
 - We strongly support sufficient harmonization to enable efficient operation of wholesale gas trading markets throughout Europe: "what would an ISO do?"
 - Some parts of the framework guidelines on interoperability, in particular data exchange rules, will need to apply to DSOs, SSOs and LSOs.
 - Need standard units to be used for TSO communication (e.g. for information provision, capacity bookings, nominations etc.)
 - Open standard data formats, content definitions, processes and communication protocols that must be applied between TSOs, Shippers, Traders, Regulators and all relevant market participants
 - Harmonization of nomination and re-nomination processes is necessary (and will need to be in the scope if it is not in other Network



Harmonisation of units – Use in CEN standards related to gas infrastructure

ENTSOG JSWS 2, 2012-11-28, Brussels

Daniel Hec, Marcogaz for CEN/TC 234 © Hiltrud Schülken, CEN/TC 234 Secretary



With view to the general European harmonisation and the use of units in the generally acknowledged European Standards for the gas infrastructure, CEN/TC 234 respectfully propose to switch the units to those used in the European Standards.



Use of units in related CEN standards

Parameter	ENTSOG Business Rules INT 0327-121023	European Standards for gas infrastructure (CEN)
Volume ⁽⁾	m ³ (0°C, 1.01325 bar(a))	m ³ (15°C, 1.01325 bar(a))
Gross Calorific Value (GCV)	kWh/m³ (25°C, 0°C, 1.01325 bar(a))	MJ/m ³ (15°C, 15°C, 1.01325 bar(a) or 1013.25 hPa (a))
Energy ⁽²⁾	kWh (25°C, 0°C, 1.01325 bar(a))	MJ (15°C, 15°C, 1.01325 bar(a) or 1013.25 hPa (a) ⁽³⁾)
Wobbe Index	kWh/m ³ (25°C, 0°C, 1.01325 bar(a))	MJ/m ³ (15°C, 15°C, 1.01325 bar(a) or 1013.25 hPa(a) ⁽³⁾)
Reference combustion temperature	25 °C	15 °C
Reference Volume measurement temperature	0 °C	15 °C
Reference pressure	1,01325 bar (a)	1,01325 bar(a) or 1013,25 hPa (a)

^[1] Note: ISO 13443 recommends that the reference conditions are stated as: volume measurement reference temperature, reference pressure) ^[2] Note: ISO 13443 recommends that the reference conditions are stated as: combustion reference temperature, volume measurement reference temperature, reference pressure)

[3] Note: Currently, the draft EN on gas quality uses 1013.25 hPa (a), all other relevant European Standards use 1.01325 bar (a)



CEN/ISO Standards	Remark		
EN 1594 "Gas infrastructure - Gas pipelines with maximum operating pressure over 16 bar – Functional requirements"	Volume is defined under normal and standard conditions. Gas quality is defined by making reference to ISO 13686 (see below).		
EN 1776 "Gas infrastructure – Gas measuring systems"	Volume and combustion reference defined by making reference to EN 437 (see below).		
EN 437 "Test pressures – test gases – Appliance categories"	All CEN/TC 234 standards refer to one or the other of these both standards for the gas quality until the new M/400 standard is available.		
ISO 13686 "Natural gas – quality designation"			



CEN/ISO Standard	Remark
WI 00234070 Gas Quality – Type H – present draft scope (M/400)	Draft scope refers to Wobbe Index given in EN 437 and is currently subject to discussion. The draft standard is based on M/400 and ISO 12443 and is basis for the final scope. Mandate M 400 states that " <i>The standards shall be defined</i> <i>according to reference conditions as recommended by the</i> <i>technical committee ISO/ TC 193. (ISO 13443)</i>
ISO 13443 Natural gas Standard reference conditions	States "The standard reference (or base) conditions of temperature, pressure and humidity (state of saturation) to be used for measurements and calculations carried out on natural gases, natural-gas substitutes and similar fluids in the gaseous state are 288,15 K and 101,325 kPa ⁽⁴⁾ for the real dry gas." And gives recommendation for conversion in other conditions.



Thanks for your attention and the consideration of the CEN/TC 234 statement!

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Marcogaz TECHNICAL ASSOCIATION

OF THE EUROPEAN NATURAL GAS INDUSTRY



Marcogaz comment on Business Rules Chapter III units

ENTSOG SJWS 2 28th November 2012 Brussels

GCV and Energy

marcogaz

ENTSOG proposal

- Use kWh, reference conditions 25°C, 0°C, 1.01325 bar(a)
- Use for TSO-TSO communication and other parties

Marcogaz point of view

- GCV used to express energy on the whole gas chain
- Proposal harmonises only one part of the chain,
- Some National references different
- Consequences still a lot of complexity will remain



- marcogaz
- Wobbe index is a specification essential for safety purposes
- As such it shall be:
 - Unambiguous
 - Clear
 - Understandable by everyone
- Standards are using MJ/m³ (15°C, 15°C, 1013.25 hPa)
 - EN 437 basis for certification of gas appliances
 - future gas quality standard should use same units and references
- Network code should use same unit and references
 - Wobbe index: MJ/m³
 - Reference combustion temperature 15°C
 - Reference Volume measurement temperature 15°C
 - Reference pressure 1013.25 hPa

- Units and reference conditions to be defined carefully

- Develop a unique set of units and reference conditions is preferable
- To be applied on the whole gas chain
- In association with NRA and National & European metrology

 Minimising the global cost introduced by changing metering conditions, information system, etc.

marcogaz



2nd Stakeholder Joint Working Session

Discussion

Brussels – 28 Nov 2012



Network Code Interoperability and Data Exchange Rules 2nd Stakeholder Joint Working Session

28 November 2012 at Thon Hotel EU in Brussels

Coffee break





Network Code Interoperability and Data Exchange Rules 2nd Stakeholder Joint Working Session

28 November 2012 at Thon Hotel EU in Brussels

Closing remarks


Conclusions

- Notes and presented material to be published next week
- Feedback for business rules welcomed, preferably before 4th Dec (on nonbinding basis)
- Official consultation on draft NC in Mar-Apr'13
- Data exchange:
 - Need for some flexibility in implementation timeline
 - Handbook supported for technical details
 - Support to include standard solutions for protocol, network and format in NC
 - Stakeholder involvement in defining and evolving standards as well as in definition of content of communication
- Units:
 - Have to stay in line with existing Reg. and NCs
 - Interaction with CEN activity is necessary so as to achieve harmonisation



Thank You for Your Attention

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