

Consultation Responses Report

Public Consultation on the CNOT development process

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1. Introduction

As a result, from the stakeholders' consultation process, the network code (NC) on interoperability and data exchange rules assign ENTSG the task of preparing common network operation tools (CNOTs) wherever data exchange requirements are identified within the developed network codes. For each identified data exchange requirement, the CNOTs may include a business requirement specification (BRS) and a technical implementation guideline (IG).

CNOT process development document (INT0495-140514) outlines rules for managing the development of CNOT projects including indications of key deliverables, general milestones and the requirement for CNOT project plan.

The timescale for developing the CNOT for relevant NCs is very tight because CNOT should be available before relevant NC implementation starts and may have a significant impact on TSOs as well as on stakeholders.

This report summarises the consultation responses received. It is intended to provide an accessible summary of the views on the issues raised in the public consultation. This report could be read in conjunction with the received non-confidential responses and the CNOT process development document, which are available on ENTSG's website¹.

2. Overview of consultation responses

ENTSG received 4 responses from external stakeholders to the public consultation on the CNOT development process.

The consultation respondents are listed in Annex I.

3. Summary of responses to consultation questions

In the boxes below, ENTSG provides a high-level summary of the consultation responses received. To facilitate the reporting process, respondents' answers and remarks have been tallied in representative groups. For example, in response to Question 4 one stakeholder provided no response, three stakeholders expressed their support and there was no other responses received. In response to Question 2 one stakeholder did not agree with the concept, three stakeholders gave their support, but two of them had some further comments/questions. As mentioned above, the summary should be read while referencing the responses documents for a fuller appreciation of stakeholders' views.

¹ See <http://www.entsog.eu/publications/data-exchange>

Question 1: Does the document for the development process of Common Network Operation Tools for data exchanges provide sufficient basis for stakeholder involvement?

2	Yes
2	Yes , but stakeholders should have a possibility to give their comments already on the scoping phase.
0	No

Conclusions:

- > ENTSOG will send the draft scoping document for stakeholders' comments for 2 weeks.
- > ENTSOG will incorporate the concept of Prime Movers in the process.

Refinement proposals (refined text indicated in italics):

Stakeholders will be informed about upcoming project for new CNOT(s). *ENTSOG will ask stakeholders to identify whether they would like to participate in the project as a Prime Mover. Project plan including scope will be published on ENTSOG's website and stakeholders will have a 2-week period for providing their comments.*

Question 2: Do you agree with the proposed development phases of the CNOT and with the expected deliverables?

1	Yes
2	Yes , but clarification required on: <ul style="list-style-type: none"> ✓ formulation of the expert group; ✓ whether the stakeholders sessions shall be interactive;
1	No , need to include prototyping for IGs in order to make CNOT a standard reference document

Conclusions:

- > CNOT document shall serve as guidelines for the information that relevant messages shall contain and how it should be implemented, so that all the interested parties can 'speak the same language'.
- > ENTSOG will foresee the concept of Prime Movers for the CNOT development process. Moreover, stakeholders will be directly involved through public consultation when validating the BRS document. During that phase, an interactive workshop will be organised to explain the BRS in detail. IGs are the direct technical translation of BRS into messages by using structured language (i.e. XML). Nevertheless, ENTSOG shall ensure that stakeholder experts will be sufficiently involved before final CNOT publication.
- > Prototyping shall be considered in the planning of the IGs development phase of the CNOT process if the impact of the change on the existing processes could create a risk during implementation.
- > ENTSOG will refine the CNOT process development document, where necessary, to indicate that all the foreseen stakeholders' session shall be interactive.

Refinement proposals (refined text indicated in italics):

IG development part shall *be managed by ENTSOG. ENTSOG shall ensure that stakeholders (including Prime Movers) will be thoroughly involved before final CNOT publication. (...)*

IG shall be presented during *interactive* stakeholders' session.

Prime Movers meeting(s) will be organised during this phase.

Question 3: Do you agree with the section describing the governance of the future changes of CNOTs?

3	<p>Yes,</p> <ul style="list-style-type: none"> ✓ request to include ACER as a recipient of the change request and copy of reasoning why ENTSOG didn't accept the change to BRS; ✓ prototyping shall be done for each modification of the BRS; ✓ requirement for the process for stakeholders' information/involvement in case changes done to the BRS
1	<p>No, recommendation to apply the same process for governance of changes as for the development of CNOT itself to ensure proper level of stakeholders' involvement</p>

Conclusions:

- > ENTSOG and ACER closely cooperate to develop and implement all the requirements arising from Regulation 715/2009, including CNOTs;
- > If the required changes are substantial, ENTSOG will create new Task Force or ask the existing Task Force according to the 4 phases described under CNOT process development document to elaborate required changes; if the changes do not require further elaboration of consequences and substantial modification of the message the new version with the explanation of what has changed will be published on ENTSOG website and will be sent to stakeholders via ENTSOG communication tools

Refinement proposals (refined text indicated in italics):

All the changes shall be governed and managed by ENTSOG. *In case a request demands to change the structure of existing message(s), a Task Force ~~may~~ be installed. In the other cases (e.g. typo corrections, configuration, obvious mistakes etc.) ENTSOG will manage it and publish the result.*

(...)

In case the change is not accepted, ENTSOG shall motivate and inform the requesting party accordingly.

Question 4: Do you agree with the section describing document management and publication?

3	Yes
1	No comment
0	No

4. ENTSOG conclusions from public consultation

Based on the consultation responses, ENTSOG draws the following conclusions:

> **Stakeholder level of participation**

ENTSOG understands that CNOT process is more than just a TSOs' specific topic and therefore welcomed all stakeholders' consultation responses. ENTSOG is pleased to have received 4 valuable responses.

> **Extent of planned stakeholder involvement in project**

- ✓ ENTSOG will introduce the Prime Mover concept in all phases of CNOT development.
- ✓ ENTSOG will involve stakeholders during the scoping phase by providing a 2-week period for comments on the scope. Stakeholders will be involved during all foreseen interactive stakeholders sessions.

Annex I

Respondent	Organisation and/or company
1	Edison SpA
2	Energy Solutions
3	Eurogas DSO
4	EFET