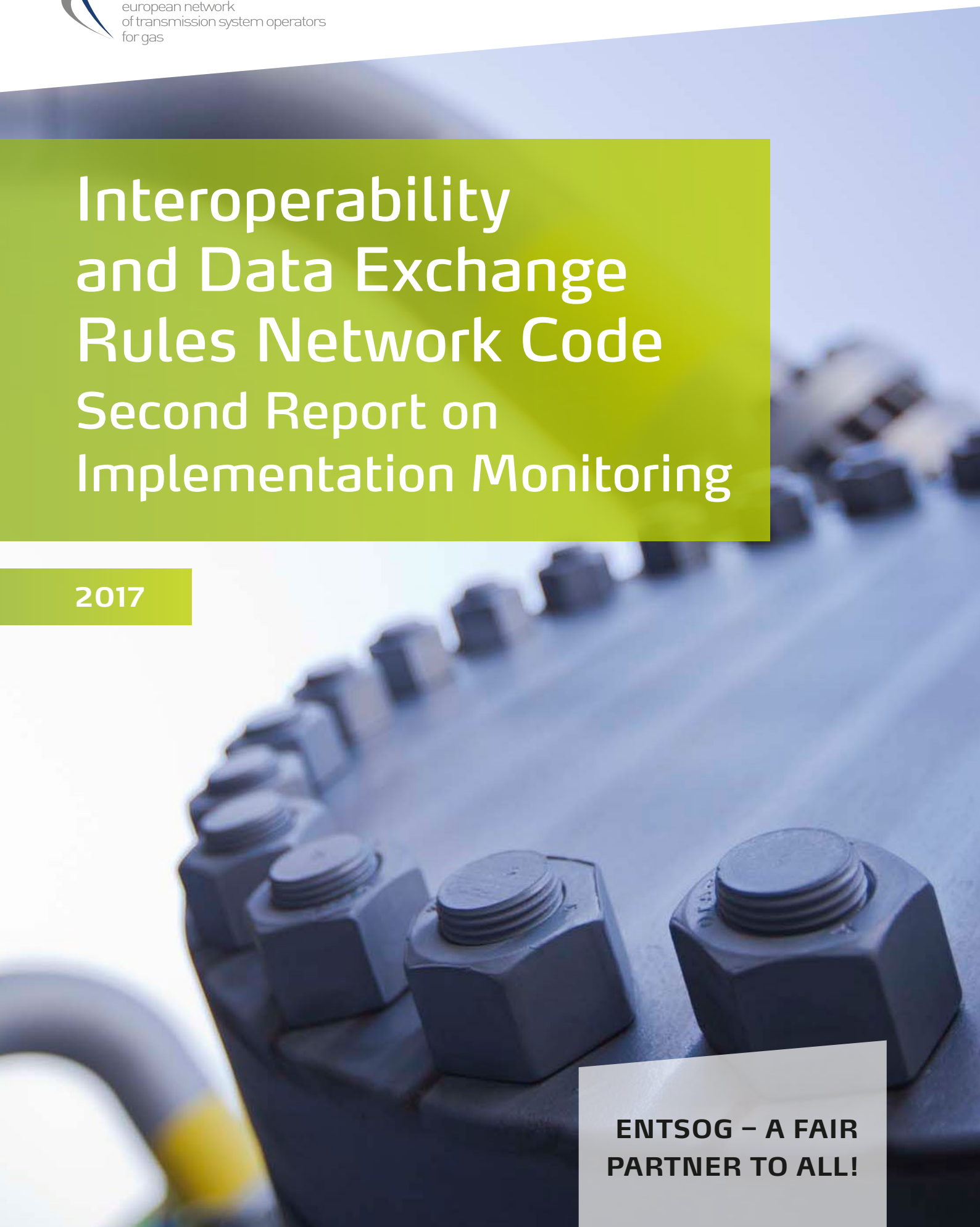
entsog

european network
of transmission system operators
for gas

Interoperability and Data Exchange Rules Network Code

Second Report on Implementation Monitoring

2017



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Introduction

The Network Code on Interoperability and Data Exchange Rules (INT NC) was developed by European Network of Transmission System Operators for Gas (ENTSOG) in accordance with the procedure set out in Article 6 of Regulation (EC) No 715/2009. Its aim is to encourage and facilitate efficient gas trading and transmission across gas transmission systems within the Union, and thereby to move towards greater internal market integration.

The Network Code was approved by the EU Gas Committee on 5 April 2015 as Commission Regulation (EU) No 2015/703. The implementation date was 1 May 2016 except for Article 5 (Interconnection Agreement Template).

Pursuant to Article 8(8) of Regulation (EC) No 715/2009, as well as to Article 25 of the INT NC, ENTSOG monitors the implementation of the Network Code.

The first implementation monitoring report of ENTSOG was published in September 2016.

By 15 January 2018, transmission system operators (TSOs) provided ENTSOG with the necessary information allowing the fulfilment of its monitoring and reporting obligations for 2017.

This report presents an overview of the implementation of the different Articles of the INT NC by TSOs on both sides of interconnection points (IPs) in the European Union. In addition, conclusions about the implementation status are drawn. Detailed information through an article-by-article analysis is provided as well.

General Considerations

This report summarises implementation status of each Article of the INT NC. Questions focus on the mandatory provisions for TSOs stipulated in each Article. The questionnaire has been prepared by ENTSOG with input from Agency for the Cooperation of Energy Regulators (ACER).

Answers to the questionnaire were received from 45 TSOs and then used as the basis for this report on implementation monitoring of the INT NC.

Two TSOs are subject to Article 1(3) ("Regulation shall not apply to interconnection points between Member States as long as one of these Member States holds a derogation on the basis of Article 49 of Directive 2009/73/EC").

Five of the reporting TSOs do not have IPs with adjacent TSOs, therefore reporting obligations are limited to Article 17 (Information provision on short-term gas quality variation).

Image courtesy of Amber Grid

Summary and conclusions

Following ENTSOG's Annual Work Programme (AWP) 2017, ENTSOG members provided their responses to a questionnaire on INT NC implementation agreed by ACER and ENTSOG.

The data provided by 45 TSOs have been used as the basis for this report.

Based on the replies from participating TSOs, the report shows that 70 of 73 interconnection points (IPs) are covered with interconnection agreements (IAs) between adjacent TSOs. Results indicate that, in the signed IAs, the adjacent TSOs agreed on the main terms and conditions foreseen in the INT NC. In most agreements, the lesser rule is implemented as the matching rule and the operational balancing account (OBA) as allocation rule.

In the majority of IAs measurement principles and rules for flow control which are foreseen in the INT NC are taken into consideration.

Chapter IV of the INT NC prescribes instruments for managing cross-border trade restrictions due to differences in terms of gas quality or odourisation practices. According to the results, no cross-border trade restrictions due to differences in gas quality or odourisation practices exist. On 2 instances, a potential restriction has been reported by only one of the adjacent TSOs. Nevertheless, the issues are being solved by cooperation between the relevant TSOs and therefore, not subject to the procedure of Article 15(2).

84 % of the TSOs comply with the obligations regarding short-term monitoring on gas quality (Wobbe Index (WI) and Gross Calorific Value (GCV)) hourly data for each entry IP.

The data exchange security requirements stated in article 22 of the INT NC are met by 84 %, (this requirement – and the whole chapter 5 – is not applicable to 11 % of TSOs).

The majority of TSOs (68.9 %) have already implemented the common data exchange solutions.

Regarding the 20 % TSOs who have not implemented these solutions yet, 2 TSOs have only implemented the optional solution but not the mandatory one with NRA approval. One TSO has implemented interactive as well as the integrated solution, but not the mandatory one.

The implementation of Common Data Exchange Solution (CDES) should have been completed by November 2017, which is 12 months after the publication of the CDES table.

In accordance with Article 23.2, other solutions from those listed in Article 21 are in place for 31 TSOs

Survey Participants

The following European TSOs participated in the survey:

COUNTRY	TSO
AUSTRIA	Gas Connect Austria GmbH
	Trans Austria Gasleitung GmbH
BELGIUM	Fluxys Belgium S.A.
BULGARIA	Bulgartransgaz EAD
CROATIA	Plinacro d.o.o.
CZECH REPUBLIC	NET4GAS s.r.o.
DENMARK	energinet.dk
FRANCE	GRTgaz SA
	TEREGA
GERMANY	Bayernets GmbH
	Fluxys TENP GmbH
	GASCADE Gastransport GmbH
	Gasunie Deutschland Transport Services GmbH
	GRTgaz Deutschland GmbH
	Gastransport Nord GmbH
	jordgasTransport GmbH
	Nowega GmbH
	Ontras Gastransport GmbH
	Open Grid Europe GmbH
	Terranets BW GmbH
	Thyssengas GmbH
	NEL Gastransport GmbH
GREECE	DESFA S.A.
HUNGARY	FGSZ Zrt.
IRELAND	Gas Networks Ireland Ltd.
ITALY	Snam Rete Gas S.p.A.
	Infrastrutture Trasporto Gas S.p.A.
ITALY	Società Gasdotti Italia S.p.A.
LATVIA	Conexus Baltic Grid
LITHUANIA	AB Amber Grid
LUXEMBOURG	Creos Luxembourg S.A. (derogation)
NETHERLANDS	BBL Company V.O.F.
	Gasunie Transport Services B.V.
POLAND	GAZ-SYSTEM S.A.
PORTUGAL	REN - Gasodutos S.A.
ROMANIA	Transgaz S.A.
SLOVAKIA	eustream a.s.
SLOVENIA	Plinovodi d.o.o.
SPAIN	Enagas S.A.
	Regasificadora del Noroeste S.A.
SWEDEN	Swedegas AB
UNITED KINGDOM	Interconnector Ltd.
	National Grid Gas plc
	Premier Transmission Ltd.
	GNI (UK) Ltd.

Interconnection Agreements

The questionnaire was composed addressing the requirements of each article of the INT NC. The survey covers Chapters II-V of INT NC and has been conducted by ENTSOG and sent to ACER for comments. The IPs connecting to non-EU countries are out of the scope of this document.

GENERAL PROVISIONS (ARTICLE 3)

70 IPs of the analysed 73 IPs have IAs in place. Only these 70 IPs are further analysed in the report.

Provisions of these IAs cover terms and conditions defined in articles 6–12 of the INT NC. For 8 IPs TSOs informed that the interconnection agreement template published by ENTSOG is signed and applied.

Regarding the remaining 3 IPs (without IA), one of them has never been in operation, there hasn't been any gas flow and adjacent TSOs are in the preparation phase of completing and signing the IA, and for the other 2 IPs, TSOs commented that IAs are in progress.

For the accounting of IPs, the following criteria have been followed:

- Pipe-in-pipe situations are considered as a single IP (e.g. Ellund, Moffat, Waidhaus, etc).
- IPs between two entry-exits zones operated only by one TSO and IPs that disappeared from the commercial offer (e.g. in connection with the establishment of VIPs) and therefore are not subject to booking procedures anymore were not included in the tables and are out of scope.
- Connection points between TSOs and DSOs or TSOs and SSOs across borders are out of scope as well.
- CAM relevant points with 3rd countries are not taken into account.

IPs which are part of pipe-in-pipe IPs are considered as one IP.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
3. GENERAL PROVISIONS	3. Is there a signed IA in place?	95.9%	4.1%	0.0%

Table 1: IA in place (Article 3)

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
3. GENERAL PROVISIONS	3. Do provisions of interconnection agreement cover at least the termsand conditions defined in articles 6–12 NC INT?	100.0%	0.0%	0.0%

Table 2: Provisions of interconnection agreements (Article 3)

INFORMATION OBLIGATION (ARTICLE 4)

TSOs were asked to provide their responses to the questions below regarding their information obligation.

According to the replies received from the TSOs, in 85.3 % of replies TSOs confirmed that network users were informed about the provisions of IAs that have a direct impact on them.

The low percentage (30 %) of affirmative answers to the question related to Article 4(2) (invitation to network users to comment on IAs) is comprehensible because TSOs have not wanted to change the relevant provisions for a majority of IAs since the INT NC came into force, therefore TSOs were not obliged to execute this provision.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
4. INFORMATION OBLIGATIONS	4.1 Have you identified information contained in IA that directly affects NUs and informed them?	85.3 %	8.5 %	6.2 %
	4.2 Since application date of the INT NC and before concluding or amending an interconnection agreement, have you invited network users to comment on the proposed text for matching, allocation and communication of exceptional events?	30.4 %	4.5 %	65.1 %

Table 3: Information obligations

RULES FOR FLOW CONTROL (ARTICLE 6)

The analysis of the respondents' answers shows that the adjacent TSOs agreed on the majority of the rules for flow control.

Arrangements to manage gas quality and "odourisation" restrictions according to Articles 15 and 19 are often considered as not applicable when there has been no need to start the formal cooperation procedures with NRA involvement foreseen in these articles. Additionally, some IPs are connecting points within one country and therefore they are not subject to article 15 and 19 of the INT NC as gas quality specifications and odourisation practices are the same.

Articles 6.2 to 6.4 do not require the provisions to be reflected in the wording of the IAs as long as the IAs do not prevent their fulfilment.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
6. RULES FOR FLOW CONTROL	6.1.a Rules to facilitate a controllable, accurate, predictable and efficient gas flow.	100.0 %	0.0 %	0.0 %
	6.1.b. Rules for steering the gas flow across the interconnection point and for minimising the deviations from the flow pursuant to the matching process.	98.6 %	1.4 %	0.0 %
	6.1.c Designation of TSO responsible for steering	100.0 %	0.0 %	0.0 %
	6.2. The quantity and direction of the gas flow is decided on an hourly basis by the adjacent TSOs.	95.7 %	1.4 %	2.9 %
	6.3.a Matching rule	98.6 %	0.0 %	1.4 %
	6.3.b Allocation rule	98.6 %	0.0 %	1.4 %
	6.3.c Flow control arrangements	98.6 %	0.0 %	1.4 %
	6.3.d Gas Quality including any arrangement pursuant to Article 15	62.9 %	0.0 %	37.1 %
	6.3.d Odourisation including any arrangement pursuant to Article 19	11.4 %	0.0 %	88.6 %
	6.4.a Safety legislation	82.9 %	7.1 %	10.0 %
	6.4.b Emergency plans	75.7 %	11.4 %	12.9 %
	6.4.b Preventive action plans	72.9 %	11.4 %	15.7 %
	6.4.c Exceptional events	94.3 %	5.7 %	0.0 %

Table 4: Rules for Flow Control (Article 6)

MEASUREMENT PRINCIPLES FOR GAS QUANTITY AND QUALITY (ARTICLE 7)

Although the level of completeness varies, in the vast majority of IAs, the main measurement principles foreseen in the Article 7 of the Network Code are currently covered.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
7. MEASUREMENT PRINCIPLES FOR GAS QUANTITY AND QUALITY	7.1.a Details of the measurement standards applicable have be established.	97.1 %	2.9 %	0.0 %
	7.1.b Designation of the TSO responsible for Installation, Operation &Maintenance.	98.6 %	1.4 %	0.0 %
	7.3.a Description of the station and its equipment.	94.3 %	5.7 %	0.0 %
	7.3.b Parameters and details: units, range, uncertainty and frequency of measurement.	94.3 %	5.7 %	0.0 %
	7.3.c Calculations procedures.	94.3 %	5.7 %	0.0 %
	7.3.d Maximum permissible error in energy.	95.7 %	4.3 %	0.0 %
	7.3.e Data validation	97.1 %	2.9 %	0.0 %
	7.3.f Verification and adjustment	97.1 %	2.9 %	0.0 %
	7.3.g Data provision content and frequency	97.1 %	2.9 %	0.0 %
	7.3.h List of signal and alarms	88.6 %	11.4 %	0.0 %
	7.3.i Corrections to measurements	94.3 %	5.7 %	0.0 %
	7.3.j Equipment failure management	92.9 %	7.1 %	0.0 %
	7.3.k Rules for facility access, additional verification, modification and attendance during calibration.	97.1 %	2.9 %	0.0 %

Table 5: Measurement principles for gas quantity and quality (Article 7)

RULES FOR THE MATCHING PROCESS (ARTICLE 8)

The majority of TSOs have confirmed that matching rules, rules for communication and processing of data are established in the IAs.

Article 8(5) a) of the INT NC sets out the application of the lesser rule as matching rule by default. 68 IPs are being operated under this principle.

In 2 cases TSOs agreed to use the processed quantities determined by one of them as confirmed quantities. In case of an exceptional event, at one of these IPs, the affected TSO's processed quantities can be used as confirmed quantities; at the other one, the "Lesser rule" is applied.

In 1 IP, although the lesser rule is used in normal conditions, adjacent TSOs agreed that during exceptional events the affected TSO's processed quantity prevails and in emergencies, the processed quantities from one side of the IP prevail.

At those IPs where another rule is used as matching rule, TSOs confirmed that users have been invited to comment the procedure.

At 41 IPs, the TSOs which have been declared as flow control equipment operators are also responsible for the matching process.

Regarding the time schedule for the matching process, for 69 IPs TSOs confirmed that it does not take longer than 2 hours, timing corresponds exactly to the time schedule described in Article 8(5) c) of the INT NC, and for 2 IPs within the 69, involved TSOs commented that the time schedule, within the renomination cycles, is less than 1 hour. For one IP, TSOs replied that other schedule is used.

In all IAs, the information and the data exchange mechanism has been defined.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
8. RULES FOR MATCHING PROCESS	8.1.a Rules detailing the matching process have been established, taking into account the daily-hourly nomination arrangements where relevant.	95.7 %	4.3 %	0.0 %
	8.1.b Rules detailing communication and processing of data have been established.	97.1 %	2.9 %	0.0 %
	8.2; 8.5.a matching rule	100.0 %	0.0 %	0.0 %
	– Lesser rule as a matching rule	97.1 %		
	– Other	2.9 %		
	8.2.b In case "Other Rule" than the "Lesser Rule" is applied, have been network users invited to comment on it?	100.0 %	0.0 %	0.0 %
	8.2.c; 8.5.b TSO responsible for the matching process	97.1 %	2.9 %	0.0 %
	– TSO in control of the flow control equipment	58.6 %		
	– other	38.6 %		
	8.2.d. Has a time schedule taking no longer than two hours been defined?	98.6 %	1.4 %	0.0 %
	8.4 Are data exchange use and the harmonised information specified?	100.0 %	0.0 %	0.0 %

Table 6: Rules for the matching process (Article 8)

RULES FOR ALLOCATION OF GAS QUANTITIES (ARTICLE 9)

TSOs are using OBA as the main allocation rule, in one case TSOs stated that a different rule is in place: users are allocated as nominated and the steering difference is allocated to an internal market point.

Also, at one IP, adjacent TSOs agreed to allocate steering differences to a balancing shipper, which is the only one active at the IP.

In case of exceptional events, some TSOs commented that other rules can apply such as pro-rata.

In most IAs, if the rule is OBA, it is recalculated by the TSO in control of the measurement equipment. For two IPs, TSOs replied "not applicable". One case corresponds to the IP using a balancing shipper. For one VIP, the recalculation is done jointly because depending on the virtualised physical IP the TSO in control of the measurement equipment is a different one.

In IAs with OBA, allocations are always equal to confirmed quantities. The OBA is also kept as close to zero as possible.

In most of the cases, the OBA limits take into account specific characteristics of each IP and/or the interconnected transmission networks, in particular: physical characteristics, the linepack capability of each transmission system, total technical capacity, etc.

Articles 9.3.c does not require the provisions to be reflected in the wording of the IAs as long as the IAs do not prevent their fulfilment.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
9. RULES FOR ALLOCATION OF GAS QUANTITIES	9.2 The allocation rule is in place.	100.0 %	0.0 %	0.0 %
	– OBA	98.6 %		
	– Other	1.4 %		
	9.2 If the rule is OBA, it is recalculated by the TSO in control of the measurement equipment.	95.7 %	0.0 %	4.3 %
	9.3.a Where the OBA applies, the allocations are equal to the confirmed quantities?	98.6 %	0.0 %	1.4 %
	9.3.b the OBA is maintained as close to 0 as possible?	98.6 %	0.0 %	1.4 %
	9.4 The OBA limits take into account specific characteristics of each IP and/or the interconnected transmission networks, in particular: physical characteristics, linepack capability of each transmission system, total technical capacity, gas flow dyna	94.2 %	0.0 %	5.8 %

Table 7: Rules for allocation of gas quantities (Article 9)

COMMUNICATION PROCEDURES IN CASE OF EXCEPTIONAL EVENTS (ARTICLE 10)

For 66 IPs adjacent TSOs have already agreed on procedures to inform each other and potentially affected network users in case of exceptional events. The remaining agreements (4) need to further progress this chapter.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
10. COMMUNICATION PROCEDURES IN CASE OF EXCEPTIONAL EVENTS	10. In case of "exceptional event" there is a procedure to inform adjacent TSOs and potentially affected network users.	94.3%	5.7%	0.0%

Table 8: Communication procedures in case of exceptional events (Article 10)

SETTLEMENT OF DISPUTES ARISING FROM IA (ARTICLE 11)

This article is implemented at 68 of 73 IPs. This requirement is not applicable when the ENTSOG template is used as the INT NC stipulates the default terms regarding the settlement of disputes, when these are not detailed in the interconnection agreement.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
11. SETTLEMENT OF DISPUTES ARISING FROM IA	11.1.a The dispute settlement mechanism specifies the applicable law.	97.1%	0.0%	2.9%
	11.1.b The dispute settlement mechanism specifies the court of jurisdiction or the terms and conditions of appointment of experts?	97.1%	0.0%	2.9%

Table 9: Settlement of disputes arising from IA (Article 11)

AMENDMENT PROCESS (ARTICLE 12)

This article is implemented at 67 IPs. It should be noted that this requirement is not applicable when the ENTSOG template is used, as adjacent transmission system operators may use the dispute settlement mechanisms developed in accordance with Article 11 of the INT NC if they fail to reach an agreement on the amendment process.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED % of IPs	NOT IMPLEMENTED % of IPs	NOT APPLICABLE % of IPs
12. AMENDMENT PROCESS	12. A transparent and detailed amendment process has been established	95.7%	0.0%	4.3%

Table 10: Amendment process (Article 12)

Units

COMMON SET OF UNITS (ARTICLE 13)

The common set of units and reference conditions is already in use by 36 TSOs for every data exchange and publication. The option in the NC for those TSOs operating in a MS connected to only one other MS to continue using a different set of units was applied by 3 TSOs. Three TSOs replied "not applicable" as they don't have CAM relevant IPs.

ADDITIONAL UNITS (ARTICLE 14)

Implementation of the article is not mandatory. In addition to the common set of units and reference conditions for data exchange or data publications a different one is applied by 16 TSOs.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
13. COMMON SET OF UNITS	The set of units and reference conditions defined is used for every data exchange and publication related to regulation 715/2009	36	3	6
14. ADDITIONAL UNITS	Has an additional set of units been defined?	16	–	–

Table 11: Units

Image courtesy of Gascade

Gas Quality

MANAGING CROSS-BORDER TRADE RESTRICTIONS DUE TO GAS QUALITY DIFFERENCES (ARTICLE 15)

Activation of article 15 is not reported from any TSOs. 6 TSOs have no interconnection points (IPs), therefore, the article is not applicable to them.

On 2 cases, a potential restriction has been reported by only one of the adjacent TSOs. Nevertheless, the issues are being solved by cooperation between the relevant TSOs and therefore, not subject to the procedure of Article 15(2).

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
15 MANAGING CROSS-BORDER TRADE RESTRICTIONS DUE TO GAS QUALITY DIFFERENCES	Is there any cross-border trade restriction due to gas quality, that cannot be avoided by the standard operations of the TSOs and that has been recognised by NRAs?	37 (83 %)	2 (4 %)	6 (13 %)

Table 12: Managing cross-border trade restrictions due to gas quality differences (Article 15)

SHORT-TERM MONITORING OF GAS QUALITY – DATA PUBLICATION (ARTICLE 16)

Regarding obligations on short-term gas quality monitoring set out in Article 16 of the INT NC, a wide majority of TSOs publish information on Wobbe Index and Gross Calorific Value on their websites. 6 TSOs have no interconnection points (IPs), 2 TSOs report the requirement is not applicable as the adjacent TSOs are already publishing the data at the IP, and one has all IPs within the same member state.

7 TSOs are still in progress of implementing the article.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
16 SHORT-TERM MONITORING OF GAS QUALITY – DATA PUBLICATION	Are WI and GCV published on your website for each IP, that acts as an entry point and once per hour?	29 (64 %)	7 (16 %)	9 (20 %)

Table 13: Short-term monitoring of gas quality – data publication (Article 16)

INFORMATION PROVISION ON SHORT-TERM GAS QUALITY VARIATION (ARTICLE 17)

32 TSOs advised that they have defined a list of parties entitled to receive indicative gas quality information. 5 TSOs are still in the process of defining such list. The remaining TSOs (8) replied that this article is not applicable as their transmission system only has offtake at the IPs and not along the pipelines (3), they have no parties under the eligibility criteria (1) or the information is provided elsewhere (e.g. website (2) or via an informal procedure (1).

Among the 37 TSOs who have either defined or are in the process of defining a list of parties entitled to receive indicative gas quality information, 6 have not defined yet how to exchange the information.

The parameters the TSOs are providing to the relevant parties are mainly GCV, WI and full gas composition. Additionally, some TSOs also provide information on other parameters in special cases. The list of other parameters is net calorific value (NCV), pressure, temperature, methane, water dewpoint, hydrocarbon dewpoint, oxygen, hydrogen sulphide, total sulphur, relative density, mercaptans, ethyl mercaptan, Pe number, etc.

In some cases, stakeholders are not only interested in the value itself, but also on what intraday variations there have been historically and what can be expected from the influence of unconventional sources.

The frequency TSOs agreed to inform the identified parties varies significantly from real-time (continuous) to yearly, with many TSOs agreeing with relevant parties to provide information only when the parameters of interest exceed a predefined threshold.

The lead time varies between immediate (e.g. B2B communication) and several days. Several TSOs, normally those reporting by exception, stated that information is transmitted as soon as reasonably possible.

Methods of communication are linked to the frequency (e.g. industrial or business-to-business protocols for continuous data provision vs. phone for communication by exception).

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
17 INFORMATION PROVISION ON SHORT-TERM GAS QUALITY VARIATION	17 (3a) Has the list of parties entitled to receive indicative gas quality information been defined?	32 (71 %)	5 (11 %)	8 (18 %)
	17 (3b) Has a process of cooperation been started to assess what information might be provided to the relevant parties?	27 (60 %)	7 (16 %)	11 (24 %)

Table 14: Information provision on short-term gas quality variation (Article 17)

MANAGING CROSS-BORDER TRADE RESTRICTIONS DUE TO DIFFERENCES IN ODOURISATION PRACTICES (ARTICLE 19)

No TSOs have reported any restrictions linked to odourisation practices. 6 TSOs have no interconnection point (IPs) and they are therefore not subject to the application to the article. 4 TSOs considered the requirement as not applicable as they are not adjacent to any odourised system.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
19 MANAGING CROSS-BORDER TRADE RESTRICTIONS DUE TO DIFFERENCES IN ODOURISATION PRACTICES	Is there any cross-border trade restriction due to differences in odourisation practices that cannot be avoided by the concerned TSOs and that has been recognised by NRAs?	35 (77 %)	0	10 (23 %)

Table 15: Managing cross-border trade restrictions due to differences in odourisation practices (Article 19)

Data exchange

The majority of TSOs (68.9%) have already implemented the common data exchange solutions.

2 TSOs started implementing this chapter only last year following the end of a derogation from the Third Package. For 6 TSOs, the Data Exchange chapter is not applicable since they have no IPs.

DATA EXCHANGE SYSTEM SECURITY AND AVAILABILITY (ARTICLE 22)

All TSOs to which this requirement is applicable state that the system security and availability requirements are met. This requirement (and the whole data exchange chapter) is not applicable for TSOs without IPs.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
22	Data exchange system security and availability	38 (84.4%)	2 (4.4%)	5 (11.1%)

Table 16: Data exchange system security and availability (Article 22)

Image courtesy of Snam

IMPLEMENTATION OF THE COMMON DATA EXCHANGE SOLUTIONS (ARTICLES 23(1) AND 24)

The Common Data Exchange Solution are specified in the ENTSOG Common Data Exchange Solution Table. The table includes a mandatory solution and an optional one, which vary depending on the data exchange requirements:

- For Nominations and Matching, the common solution is document-based data exchange and the optional is interactive data exchange.
- For the Capacity trading process, the common solution is interactive (except for communication of surrender capacity sold, document-based) and the optional one is document-based data exchange (or interactive for surrendered capacity). Most of the interactions with the network users are nevertheless to be carried out by the Auction Offices.

The following paragraphs focus on the implementation of the Nominations and Matching processes.

The majority of TSOs (68.9 %) have already implemented the common data exchange solutions.

Regarding the 9 (20 %) TSOs who have not implemented these solutions yet, most of them stated that common solution is not fully implemented for time being. 2 TSOs have only implemented the optional solution (interactive) but not the mandatory one (document-based) with NRA approval. One TSO has implemented interactive as well as the integrated solution, but not the mandatory one.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
24.1	Implementation of the common data exchange solutions	31 (68.9 %)	9 (20 %)	5 (11.1 %)

Table 17: Implementation of the common data exchange solutions (Articles 23(1) and 24)

CONTINUED APPLICATION OF EXISTING SOLUTIONS (ARTICLE 23(2))

TSOs were asked if they use other data exchange solutions than defined in article 21 for data exchange requirements foreseen by Article 20(2)

In the majority of cases, respondents (68.9 %) indicated that they use other data exchange solution in addition and in agreement with their NRAs as foreseen in Article 23(2).

Half of these respondents had agreed with their NRAs that existing solutions could stay in place for a certain period, in most cases this transition phase will finalise in 2018.

9 TSOs (20 %) answered that there is no alternative solution in place next to defined in the INT NC.

ARTICLE	SHORT DESCRIPTION	IMPLEMENTED Number of TSOs	NOT IMPLEMENTED Number of TSOs	NOT APPLICABLE Number of TSOs
23.2	Other DE solutions than Art. 21	31 (68.9 %)	9 (20 %)	5 (11.1 %)

Table 18: Continued application of existing solutions (Article 23(2))

Abbreviations

ACER	Agency for the Cooperation of Energy Regulators
BP	Booking Platform
CAM NC	Network Code for Capacity Allocation Mechanisms
ENTSOG	European Network of Transmission System Operators for Gas
EU	European Union
GSA	Gas-System Auction platform
IP	Interconnection Point
LT	Long-Term
NRA	National Regulatory Authority
RBP	Regional Booking Platform
TSO	Transmission System Operator

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