

ENTSOG Consultation on TYNDP 2011-2020

EDF Response

24th June 2011

Infrastructure

In order to ensure a consistent, transparent and non-discriminatory collection process of infrastructure projects, ENTSOG launched a public questionnaire during Summer 2010. Information collected through this process was used to provide some aggregate views on the infrastructure development on the ten-year range and, in particular, for network modelling. All information was also published in an annex to the TYNDP 2011-2020.

Was the call for information process sufficiently well-advertised (a press release, a banner on the ENTSOG website, an email to all participants to the GIE conference 2010). What other communication channels should be used?

Response

The submission date of the call for information could be optimized, as the last one was at the end of the summer break. Moving it to before or after the summer break might ease internal submission processes.

Collected data

Considering the different interests of the European institutions & MSs (cf. Communication of the European Commission on Energy Infrastructure Priorities for 2020 and beyond; Council Regulation (EC) 617/2010 concerning the notification to the Commission of investment projects in energy infrastructure within the European Union), energy regulatory authorities (cf. ERGEG TYNDP recommendations) and network users, incl. third party project sponsors, with regards to the TYNDP, do you consider the requested data requested as too detailed, balanced or not detailed enough? Please explain your choice.

If you are a third party project sponsor would you be willing to provide to ENTSOG your project cost estimate if ENTSOG committed to keeping it confidential and would use the same aggregation for such information as in the current TYNDP (FID/non-FID projects separately for transmission, storage and LNG)?

Do you think that ENTSOG should or should not include projects in the TYNDP where not all requested information has been submitted?

Response

We consider the requested data as having the right level of detail to allow ENTSOG to fulfil its task of establishing a coherent network development plan.

With regard to providing cost estimates, we consider that the communication of such estimates should be made on a voluntary basis only. The reliability of such estimates depends largely on the status of the project and this information might at some stages be confidential and commercially sensitive.

As to whether projects, that submit incomplete information, should be included or not, ENTSOG could designate the information that is absolutely necessary (and therefore any project that does not submit this information would not be included) and the information that is useful. In any event, the way of dealing with this issue should be consistent across all projects.

Criteria and clustering

In order to build different infrastructure scenarios to better assess the possible evolution of the European gas network, ENTSOG has chosen to cluster projects as FID (Final Investment Decision taken) or non-FID. The FID criterion is seen by ENTSOG as the only transparent, pragmatic and non-discriminatory one. All projects of a given category have been considered simultaneously while modelling the network.

Do you consider the FID criterion as relevant?

Do you see other relevant criteria? If yes, which ones?

Response

We consider the FID criterion to be the most relevant and objective to differentiate projects on a non-discriminatory basis. This allows the most neutral approach towards the various projects at hand.

Demand

What is your opinion on ENTSOG's approach to demand? Do you think that ENTSOG should apply a demand definition based on more criteria than climatic conditions?

If yes, what parameters should be used?

Is the current comparative approach to demand outlooks published by other organisations/stakeholders sufficient or should more analysis be done? (Please consider that currently only the PRIMES and ENTSOG data are provided on country basis).

Response

EDF does not have any comment.

Supply

Considering supply outlook is beyond TSOs' remit, do you consider this first ENTSOG attempt being beneficial?

When defining supply shares for the Reference Case scenario, ENTSOG based its approach on historical data of 2008 and 2009, then increased according to the Net Demand (national demand minus indigenous production) increase. In order to assess not only capacity availability some supply potential was used for each source as a supply cap.

Do you agree on the way to define supply shares under the Reference Case?

Do you agree with the definition of the supply cap?

If any, in which direction supply analysis could be investigated further?

Response

The approach chosen by ENTSOG appears to be beneficial in order to gain a rough overview of where supply might originate from in the future.

Nonetheless, those assumptions will only provide a scenario which may not reflect future supply contracts. As such, it should be interpreted cautiously.

SoS resilience

For this second edition, ENTSOG considered the following scenarios: technical disruption (Norway and North Africa), transit disruption (Ukraine and Belarus), supply disruption (Qatari LNG) and the low deliverability of underground storage facilities.

Do you consider these scenarios appropriate?

What other scenarios should, in your opinion, be used?

ENTSOG used the remaining flexibility indicator (being one minus the ratio between entering flow into a country and the entry capacity into that country) in order to assess the network resilience and to identify investment gaps.

Do you consider this indicator as meaningful?

What alternative or additional indicator could be used?

Response

EDF does not have any comment.

Market integration resilience

In its first attempt to picture market integration at the European level, ENTSOG has considered the supply diversification as a robust and meaningful underlying factor (contractual congestion is supposed to be solved by REG-715). What is your view on the approach parameters:

No limitation in supply in order to assess network robustness ('capacity potential' approach)?

An even physical spread of each supply source one by one?

3 different supply sources, including indigenous production, as being the benchmark?

A 5% minimum share to consider a supply source within a given country?

Do you consider this approach as requiring additional development? Or do you consider another approach as being more relevant?

Response

EDF does not have any comment.

Network model

ENTSOG has chosen the modelling approach based on market zones linked by entry-exit capacity as being consistent with both REG-715 requiring entry/exit regime and market products sold by TSOs.

Having in mind that translation of a physical network into a commercial offer is a TSO responsibility, how could the model be improved?

When considering the import routes from a given supply source, ENTSOG has considered an equal load factor as a robust approach on a 10-year range.

Do you consider it as an appropriate methodology? If not what alternative approach would you advocate?

Response

EDF does not have any comment.

Considering that not every theoretical scenario could be run, what should be the priority of a more robust resilience assessment:

Running some sensitivity on demand (severe climatic conditions, yearly...)? If yes which types?

Considering additional SoS scenarios? If yes which ones?

Considering additional Market integration scenarios? If yes which ones?

Individual infrastructure corridors? If yes which ones?

Response

With regard to the utilisation of storages, it appears that in order to assess network resilience on a 1 in 20 demand day, the whole storage capacity was deemed available. It could be useful to run such an evaluation considering the impact when only parts of the storage capacity are available as it could be the case at the end of period of strong winter demand.

General questions

Considering that stakeholders' involvement in TYNDP process is crucial regarding the identification of their expectations and the collection of data beyond TSOs' scope, are you satisfied with the dialogue between ENTSOG and stakeholders during the TYNDP process?

How could this process be further improved?

What were your main expectations regarding ENTSOG TYNDP 2011-2020?

Has the report met these expectations?

Considering the TYNDP as a continuous process facing a rapidly evolving market and expectations which improvement do you value the most in comparison with the first TYNDP?

Which improvement should be given priority for the next edition (maximum 3 ranked answers)?

Response

EDF does not have any comment.

Please feel free to address any other issues that may not be covered by the questions but, you think, deserve further elaboration?

Response

In the use of country codes, the term "UK" should not be used as this includes England, Wales, Scotland and Northern Ireland. Separate arrangements exist for Northern Ireland and presented information should recognise this.