

Consultation document on ENTSOG TYNDP 2015

Through this document, European Network of Transmission System Operators for Gas (ENTSOG) launches a formal public consultation on its Ten-Year Network Development Plan (TYNDP) 2015 published on 16 March 2015.

ENTSOG published TYNDP 2013-2022 in February 2013 and, during the subsequent consultation, received valuable feedback from the stakeholders, including ACER Opinion (September 2013). For the TYNDP 2015, ENTSOG has pursued its stakeholder engagement process organizing Stakeholder Joint Working Sessions from January to May 2014, two public workshops in November 2013 and June 2014 and many bilateral talks. It was a joint process covering both the development of TYNDP concept and the adaptation of the CBA methodology under the TEN-E Regulation. Considering the strong link between TYNDP and CBA methodology, the feedback received through this questionnaire will be factored in both deliverables.

ENTSOG has endeavored to take into account all comments received and encourages stakeholders to stay actively involved in the TYNDP process. Through their response to this public consultation, stakeholders will help ENTSOG to measure in which extent TYNDP 2015 meets their expectations (Part A) and to prepare next edition (Part B).

This consultation will be open today and will end on 5 June 2015. Responses should be submitted by email to the following mail box: tyndp@entsog.eu.

This public consultation should not only be taken as a regulatory obligation by ENTSOG but as a necessary step for the continuous evolution of the TYNDP, aiming the fulfillment of reader's expectations.

0. Contact details

Name
First and Last Name: Predrag Grujicic

Organisation
Company/Organisation Name: Energy Community Secretariat
Job Title: Head of Gas Unit

Contact details
Email: predrag.grujicic@energy-community.org
Tel: +43 1 535222217
Mobile: +43 664 8498210
Address
Street: Am Hof 4
Postal Code: 1010
City: Vienna
Country: Austria

How would you describe your organisation?

<input type="checkbox"/>	Association (please specify type)
<input type="checkbox"/>	Project promoter
<input type="checkbox"/>	End user
<input type="checkbox"/>	Network user
<input type="checkbox"/>	Trader
<input checked="" type="checkbox"/>	Other (please specify) – the Secretariat is the permanent institution of the Energy Community, established by the multilateral Treaty, which aims at expanding the energy acquis communautaire beyond the EU and at founding a truly pan-European

market. The Secretariat has a monitoring role towards the Treaty's Contracting Parties.



PART A – Feedback on TYNDP 2015

1. Infrastructure Chapter

In which extent this chapter meets your expectations?					
Poorly:		Sufficiently:		Perfectly:	x
Which parts of this chapter you particularly appreciate, if any?					
<p><i>This chapter provides an overall insight of progress accomplished in-between the TYNDPs. Especially, we appreciated the elaboration on FID (final investment decision) and non-FID projects'</i></p>					
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?					
<p><i>Perhaps the chapter could be take more critical stance as to real progress achieved – the gap between the projects under construction or under FID and the 'inactive' is dramatically high. Also, reaching a common understanding/definition of what 'FID' represents would add value to the Report.</i></p>					

2. Barrier to investment Chapter

In which extent this chapter meets your expectations?					
Poorly:		Sufficiently:	x	Perfectly:	
Which parts of this chapter you particularly appreciate, if any?					
<p><i>The very existing of such a chapter is appreciated.</i></p>					
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?					
<p><i>The next edition will have to look into 'other' barriers to investment, esp towards policy and regulatory framework. The majority of barriers (66%) are under label 'others'. This does not help much to establish the real problem. Perhaps next editions might end up with proposals how to eliminate or reduce certain barriers.</i></p>					

3. Demand Chapter - Analysis of historical demand

In which extent this section meets your expectations?					
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Poorly:	Sufficiently:	Perfectly:	x
Which parts of this section you particularly appreciate, if any? <i>all</i>			
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion? <i>Detailed split of sources in a peak demand (LNG/pipelines/UGS/NP...)</i>			

4. Demand Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?			
Poorly:	Sufficiently:	Perfectly:	x
Which parts of this section you particularly appreciate, if any? <i>very impressive elaboration of climate considerations</i>			
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion? <i>Perhaps more attention should be paid to evolution of final gas demand (also addressing a so-called green transition). On the other hand, the uncertainty of gas-to-power generation demand shows the limitations of any projections. The data used from ENTSO-E (2014) reflect even older plans of some MS/Contracting Parties (CPs) which – as it happened to be – were at that time too optimistic. These data need to be critically reassessed again. The expectations of a gas-to-power boom (related to the South Stream project), have never been really solidly sounded in reality. Thus, here the direct communication with the CPs' gas TSOs or the Secretariat would have been crucial to receive a more realistic gas-2-p demand in the region. The ambitious data for g-2-p caused many (wrong) implications in supply and disruption scenarios in the rest of the report.</i>			

5. Supply Chapter - Analysis of historical supply

In which extent this section meets your expectations?			
Poorly:	Sufficiently:	Perfectly:	x
Which parts of this section you particularly appreciate, if any? <i>Details on the gas exports; route by route approach</i>			

Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?

6. Supply Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?

Poorly:		Sufficiently:		Perfectly:	x
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Which parts of this section you particularly appreciate, if any?

Very good elaboration of domestic production, including bio-gas and shale gas.

Highly valuable part on LNG (worldwide)

Low infrastructure scenario well defined.

Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?

The accuracy. Lack of LT LNG, RS production, wrong data from the CPs (FYRoM does not have gas production (in TYNDP we saw a 100% increase in the past- totally wrong), the role of Turkmenistan in the TYNDP is not 100% clear. Again, we suggest closer communication with the Secretariat to improve the accuracy of the Report.

High infrastructure scenario probably too optimistic. Intermediate scenario – as an average between the two - appears to be artificial.

7. Assessment Chapter

In which extent this chapter meets your expectations?

Poorly:		Sufficiently:	x	Perfectly:	
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Which parts of this chapter you particularly appreciate, if any?

This is the most important part of the TYNDP. It has provided for a deep and thorough analysis of different scenarios from different aspects (pricing, security of supply, infrastructure resilience...)

Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?

First of all, as regards infrastructure resilience (SoS) – other disruption scenarios should be analyzed – for example: LNG, NO, Nord Stream disruption scenarios

Secondly, the monetization chapter is to a certain extent problematic and should be abolished in

the next edition.
Finally, the supply source price dependence is also tricky and difficult to understand. We propose that a new model be developed for the next edition (also, we have reservations to a pure mathematical top-down approach).

8. Layout of the report (clarity of the analysis, graphical representation...)

In which extent do you consider that the form of the report support its content?					
Poorly:		Sufficiently:		Perfectly:	x
Which layout elements you particularly appreciate, if any? <i>Diagrams and maps. Perhaps a bit bigger font.</i>					
Do you have any specific concerns regarding the layout of the report? If yes, do you have any suggestion? <i>no</i>					

9. Stakeholder engagement process

Do you consider that ENTSOG offered you sufficient opportunity to be involved in TYNDP process?					
Yes:	x		No:		
Have you taken part in any public workshop or Stakeholder Joint Working Session related to TYNDP 2015?					
Yes:	x		No:		
Which part of the process have you particularly appreciated, if any (public workshop, Stakeholder Joint Working Sessions, bilateral meetings, data collection...)?					
Do you have any suggestion regarding how ENTSOG could improve the engagement process? <i>ENTSOG-ECS bilateral meetings and bilateral cooperation on the TYNDP in particular; this would help in reassessing the CPs data. The best and only practical solution would be that the CPs TSOs become full-fledged members of ENTSOG. Also, the Ukrainian system must be incorporated in the TYNDP.</i> <i>Enhancing the cooperation with Turkey's TSO.</i>					

10. General comment

What is your overall appreciation of TYNDP 2015?									
Very poor		Poor		Average		Good	x	Very good	
Do you have any additional comment on the extent in which TYNDP 2015 meets your expectations?									
<i>It meets our expectations to a high extent.</i>									

Part B – Preparation of the next edition

11. Project maturity

The quality of the assessment of the European gas system depends on the accuracy of the topology of the infrastructure (the way firm capacity interlinked different systems being transmission, storage or LNG terminal).

In case projects do not have a sufficient maturity to precisely identify interconnection with existing or planned infrastructure (interconnection point, capacity increment or commissioning date not clear enough) it affects the ability to assess not only these projects but all the others both at TYNDP and CBA level. In addition the inclusion of such projects in the assessment may give an over-optimistic picture of infrastructure development.

Please provide your preferred alternative to address this situation:

To be considered in the Assessment Chapter a project should be submitted together with a document demonstrating that some prefeasibility study of its interconnection has been carried out (e.g. Memorandum of Understanding, national investment plan...). Such documents should describe the interconnection (which systems are interconnected), the capacity increment and the commissioning date.	YES
To be considered in the Assessment Chapter a project should be submitted in coordination by the promoters/operators of the interconnected infrastructures (cross-check of submissions through the online portal).	YES
A specific treatment should be put in place for projects where above conditions cannot be fulfilled. Such projects could be included in the Annex A of TYNDP to enable its eligibility to the PCI selection process but not considered in the Assessment Chapter.	YES
Other (please describe): -	

12. Evolution of infrastructure projects

Infrastructure projects are continuously evolving and new projects appear between subsequent TYNDP editions. Nevertheless considering changes in projects happening after the submission deadline will induce significant delay in the publication of TYNDP and subsequent PCI selection. For example TYNDP 2015 has been delayed in order to consider the cancellation of South Stream upon request from EU Commission.

Please provide your opinion regarding the introduction of changes in projects:

Only the projects submitted before the deadline should be taken into account. Any changes/additions/cancellations after the deadline should be disregarded.	YES
As general rule, changes on already submitted infrastructure projects should not be taken into account. Nevertheless in specific cases where the impact of the change is of major relevance, it should be considered along with the delay caused by its implementation.	YES
<p>If you have answered yes to the previous question, how such potential major changes should be identified and considered (e.g. formal request from the European Commission, agreement within the Regional Groups...)?</p> <p><i>Upon a reasoned request by the EC in extraordinary circumstances (as ultima ratio). In such cases, all stakeholders should have the same rights in amending their proposals.</i></p>	
<p>Other (please describe):</p> <p>-</p>	

13. Assessment of sustainability aspects

In TYNDP 2015, the assessment of the sustainability focuses on the quantification of the RES production and associated gas flexibility as well as the measurement of CO2 emissions from the power generation sector.

<p>Do you agree with this approach?</p> <p>If not, please explain why</p> <p>-</p>	YES
<p>Do you see other environmental perspectives that could be addressed in TYNDP assessment?</p> <p><i>The TYNDP offered an adequate range of environmental perspectives</i></p>	

If yes, what could be a methodology to address them?

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14. Streamlining of the methodology - n/a

The Assessment Chapter from TYNDP derives directly from the CBA methodology. Preliminary feedback has shown a willingness to simplify the assessment but this would imply a downscaling of the CBA methodology to be used in the PCI selection.

Please provide your opinion:

How do you consider the balance between the complexity and the comprehensiveness of the assessment?

Too complex		Right balance		Not comprehensiveness enough	
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If too complex, which part of the assessment could be removed from the methodology?

If not comprehensive enough, which assessment should be deepen or added to the methodology?

15. Priority for next edition and long term monitoring of gas quality

What should be the priority direction(s) of improvement for the next edition?

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As part of the implementation of the Network Code on Interoperability and Data Exchange, ENTSOG will have to include its first long term monitoring of gas quality in TYNDP 2017.

What are your main expectations regarding this new assessment?

An overview of the EU MS gas quality monitoring; actions and procedures if gas of a different quality has to be injected and transported via systems