			organisati	ons' level	pect to be y of involvem	nent	developm	nent of a T	, does the draft project plan for the ariff NC contained in this document	including	the freque	ink of the proposed timeline, ncy and number of public meetings?		-	ink of the proposed topics and scheduling for each SJWS? What e included?	Q5: Do you think it would be a good idea for there to be live streaming of the SJWSs?			
			-	for furthe	developme r informatio	on)?	provide sufficient basis for quality stakeholder involvement given the timelines within which this project must be delivered?												
N First and o Last name:	d Compan y Name:	Will you be represen ting an associati on (if so, please indicate) :	mover	(b)Activ e SJWS participa nt	(c)Consu Itation Respond ent		plan contains sufficient	project plan doesn't	-	agree with the	with the frequenc y and number	If the response is no, please propose some improvements for consideration.	agree with the proposed topics and schedulin g for each	agree with the proposed topics		Yes, I agree with live streamin g the SJWSs	don't think it is	Do you have any other suggestions that might enhance this process?	
1 Eric Gilhaus	AGGM Austrian Gas Grid Manage ment AG				X		x			x			x			x		No	
2 Andrew Pearce	BP Gas Marketii	n		X			x			x			x			x			
3 Doug Wood	g BP Gas Marketin g Ltd	n		x			x			x				X	Some additional consideration should be given to the overall Impact Assessment including definitions of measurable benefits expected from the exercise and a post implementation review to verify if all the effort was justified.	x			
4 Helen Stack	Centrica Plc	No		X			x			x				X	We agree with the topics presented. However, we believe that mitigating measures need to be discussed in detail.	x		Yes, the high standard of live streaming should be maintained. Th method for providing comments or questions to the Chair for online viewers could be improved.	
	Centrica Storage Ltd	UK Gas Storage Operator s Group		x			X			x					Sufficient time must be allowed to establish the rules around how NRA should assess the benefits of gas storage to the transmission network	X			
6 MARIA SCHINA				x			x			x			x			x			
7 Michael Schmölt er	E.ON				X		x			x				X	Regarding tariffication at transmission-storage points the Network Code shall adress clear rules on cost reflectivity and avoidance of double payment in E/E-systems by storage users. Storage users have paid an entry fee before entering the relevant transmission network and an exit fee will be paid upon exit therefrom. Cross subsidies between network users should be avoided, which means that the tariffs applicable at storage shall be cost reflective while taking into account the service rendered at the transmission- storage point. Gas storages contribute to system stability, efficient use of the network and efficient level of investments. This was clearly identified in a study of Pöyry of which ACER is aware. Such contribution and the respective saved costs have to take into consideration to avoid cross subsidies between network users storing gas resp. not storing gas.	x			

8 Alexand er Frank					X	X		X	in general we do agree. nevertheless, we were wondering whether it is necessary to finish the main consultation window already by end of July considering that ENTSOG needs to sumbit the final code by 31.12.2014	X		X	
9 Amroze ADJUWA RD	-			x		x	EDF welcomes ENTSOG's approach that aims at focusing on stakeholders' involvement and inputs. In that respect, EDF believes that the draft project plan for the development of a TAR NC provides sufficient information for stakeholders to have a clear view on this year's work.	x	EDF believes that the proposed timeline is quite tight but welcomes ENTSOG's proposal to issue its initial draft TAR NC by May 30th. EDF considers that the frequency and number of public workshops will help stakeholders to express their views and comments, thus helping a fruitful development of TAR NC.	x	EDF considers that the main topics are dealt with in ENTSOG's draft project plan for the development of TAR NC. EDF believes that numerical examples should be provided by ENTSOG as they are of great value to help stakeholders to understand the issues at stake. Furthermore, EDF is of the opinion that a special focus should be granted to the following topics: - Examples of numerical assessment for cost allocation methodologies - The impact of floating tariffs and the assessment of mitigation measures such as the proposal to use the auction premium as a "buffer" to sweeten tariff increases - The impacts of the foreseen regulatory changes on existing contracts - The minimum notice period for tariff changes - For incremental and new capacities, a clear assessment on the "f factor" (f and 1-f) and the determination of its parameters should be carried out, since its major importance in the economic test.	X	EDF believes that live streaming is necessary. Indeed, given the frequency of SJWS during next 6 months, stakeholders will not always be able to attend the meetings in Brussels. In that respect, a web streaming can enable stakeholders to improve their involvement in the envisaged process.
10 Andrea Bonzanni	Trading	EDF Trading will convey positions by EFET in addition to its own	x				The project plan provides sufficient information. We would have however benefitted from the publication of a detailed impact assessment of ACER's proposed framework guidelines, at least with respect to the most contentious points (mitigation measures; multipliers for short-term products; floating payable price).	x		x	We generally agree with the approach. However, the topics of each SJWS should be made more flexible, allowing stakeholders to focus on specific issues and/or dedicate more time to particularly complex or contentious points (currently all general topics appear to have been scheduled twice with a one month interval between them). We expect the SJWSs to focus on issues such as implementation and mitigating measures, transparency provisions and publication requirements, reserve prices and multipliers, additional charges for dedicated services or infrastructure and storage tariffs. Tariff-related aspects discussed in the parallel SJWSs on incremental capacity should be regularly reviewed and discussed with a view to ensuring full coherence of incremental capacity provisions with the main body of the Network Code.	X	We greatly value publication of documents and presentations prior to the meetings. Sufficient notice gives stakeholders the opportunity to properly evaluate the documentation and consult internally in order to provide more thorough and meaningful feedback.
11 Monica Immovill i				x		x	Yes, we agree with the planning of the various SJWSs: table at page 13 seems to allow stakeholders to touch all the issues at stake in the NC at least twice during the process and not in consecutive sessions. That would allow stakeholders enough time to study and assess ENTSOG's proposals and to provide more detailed views.	x	The timeline is very tight, but previous experience with other NCs showed that it is feasible. Furthermore, concentrating in the first half of the year the most demanding part of the process (in terms of travelling and deadlines for feedback), will allow ENTSOG to manage unplanned complications that could possibly arise. Finally, it is important that, as it was in the past,– during the SJWSs – an open and fair discussion between all the stakeholders is guaranteed, in order to maximize the benefits coming from the meeting.	x	We agree with the proposed topics and scheduling. In terms of additional topics to be treated, we would suggest to reserve some time for a detailed discussion of mitigating measures. Also, we would recommend to include into the programme of the various SJWSs practical and numerical examples that could help stakeholders to better understand and assess ENTSOG's proposal.	X	We support the provision of a live streaming service, that will reduce travel costs that sometimes represent a relevant barrier for interested stakeholders to participate. It is important that, as for the past SJWSs, the streaming allows a real-time interaction of viewers, so that they can intervene to express views and pose questions.

12 Aygu Avtal va	(ho	((n F o E T	EFET (Europea n Federati on of Energy Traders)		X		X	Q2: As an Active SJWS participant, EFET expects to be represented at each workstream meeting and to present its views on issues which are of most relevant to its members. Representatives from a number of EFET member companies are also expected to nominate themselves as Prime movers and will use this as a basis use for updating the wider EFET membership on progress in developing the Network Code. Q3: Broadly yes. We trust that ENTSOG will encourage the same level of stakeholder involvement and collaboration in developing the tariff Network Code as they have done with previous Network Codes.		x	Whilst we accept that ENTSOG needs sufficient time to develop proposals and ultimately to agree these through its internal governance process, we are concerned that the timeline may not allow sufficient time at the outset for the discussion and development necessary for a Network Code of this complexity. As a minimum therefore, we think that ENTSOG should include contingency within Phase 2 of the project plan to allow for further stakeholder discussion, such that if it becomes apparent after the first few SJWS's that topics are not able to be covered in the level of detail necessary within the current timeline, further meetings can be accommodated. EFET would much prefer to extend the overall Network Code timeline by a few months if this results in a well- considered and effective Network Code than to stick rigidly to the formal one year timeline specified in the Regulation and end up with a Network Code which is ineffective or which, worst still, introduces inefficiencies where they do not currently exist.	X	The proposed topics do not seem to fully reflect the topic headings as set out in the Framework Guidelines. For example, implementation (and in particular mitigating measures), reserve price, multipliers, storage tariffs and additional charges for dedicated services or infrastructure are not specifically referred to in the SJWS topic list. Whilst these are probably included within a more general description of the topics and clearly cannot be ignored, it would be helpful if ENTSOG could revise, or further break down, the SJWS topic list for each workstream such that it is possible to map these to topic headings listed in the Framework Guidelines. ENTSOG appears to have scheduled most topics for discussion at least twice with a one month interval between them. Presumably this is to further refine its initial proposals in light of initial stakeholder views and we generally support such an approach. However, we believe there are certain topics, namely reserve prices (including multipliers and seasonal factors), payable price and transparency which merit early discussion and which are likely to require more than two SJWS discussions. There are also other topics, such as virtual interconnection points and bundled capacity, which are unlikely to require much discussion and which can be wrapped up in a single SJWS towards the end of the process.	X	Yes. The quality and interactive capability of the live streaming used by ENTSOG for previous Network Codes has been much appreciated by EFET members and should be continued. In our view it may help to enhance Phase 2 of the development process by scheduling an interactive session within an SJWS to explore the interaction between reserve price multipliers, seasonal factors and payable price and how these influence booking behaviour and revenue recovery. This could be along similar line to the interactive sessions held during the CAM Network Code development process, on auction algorithms and revenue equivalence. Running through further worked example (albeit simplified) of each of the six cost allocation methodologies could also help to provide a more complete stakeholder understanding of this complex issue, which is something previous verbal presentations and written examples have still not succeeded in doing.
13 edoa settir	rdo El nio SF				x										
14 Hein Bert Schu		nergie- Y ederla d	Yes			x								x	
15 Simo Rossi	- E	ni			x		x		x			x	The proposed topics and scheduling for each SJWS seem to be appropriate. However, we believe that specific attention should be given to discussions on the mitigating measures to be applied when implementing the new rules	x	
16 Gunr Steck		ON		X			x			x	The proposed timeline is challenging. It would be good to shift time from the internal ENTSOG decision making to the SJWS.	X	We would encourage ENTSOG to particularly dedicate time and focus to the question of how price rises - not only those due to the implementation of the NC - in longer term capacity contracts can be mitigated.	X	Live streaming certainly faciltates participation in the network code development process. We support it. Also, the BAL NC has proven that it is essential to publish written text of draft NC provisions ('business rules') before the relevant workshops as this enables stakeholders much better to reflect on the different topics.

17 Sébastie n Doligé		ctr Eurelect ic	r		x	x	Yes we believe the project plan provides a reasonably good basis for	. ×	Generally speaking, we are quite satisfied with ENTSOG transparency,	Х		We believe the list of proposed topics is fine. We would like to ask ENTSOG to publish well in advance on its website the preparatory	х	The use of webinars would be welcomed.
							a quality stakeholder involvement.		inclusiveness and organisation of the network code process. This said, we would like to underline the importance of giving stakeholders enough time to respond to written consultations; this is really necessary for associations with a large membership. Workshops and meetings are as important as written answers.			documents that need to be read before the workshops take place.		
18 MARGO LOUDON		GA YES		x		x		×	It is a very demanding programme but Eurogas will aim to attend all the SJWS meetings.	x		Eurogas would like to see mitigating measures specified as a discussion item.	X	There are arguments for and against. It will offer a low-cost means of participation, free of travel hassle, convenient for company representatives. On the other hand, you may increasingly find that the SJWS are dominated by Brussels- based representatives, and face to face discussions with a wider range o stakeholders is reduced.
19 Kees Bouwens	ExxonN s obil	И OGP	x			x		x		x			x	
20 Philipp Palada	Gas Infrastr cture Europe	Gas ru Infrastru cture e Europe	x			x		x		x			X	
21 Nicole Otterber g	Gas Storage	Gas e Storage e Europe (GSE)			X	x		X			x	No, the treatment of storage IPs requires further clarification and should be discussed under cost allocation. With regards to storage the Network Code shall consider clear rules on cost reflectivity and avoidance of double payment in E/E-systems by storage users. Storage users have paid an entry fee before entering the relevant transmission network and an exit fee will be paid upon exit therefrom. Cross subsidies between network users should be avoided, which means that the tariffs applicable at storage IPs shall be cost reflective while taking into account the service rendered at the storage-transmission point. Gas storages contribute to system stability, efficient use of the network and efficient level of investments.		
22 Ivelina Boneva	GasTeri B.V.	ra No		X		x		X	GasTerra acknowledges ENTSOG's obligation to deliver the TAR NC within the indicated period. However we find this a very ambitious timeline. Therefore, GasTerra deems it wise to re-evaluate the overall deadline of 31 December 2014, between the 2nd and 3rd phase of network code development, in light of the ongoing discussion and quality of the Network code that should be delivered.		x	GasTerra would like to see the issues related to incremental capacity (the economic test, tariff issues related to incremental capacity and relevant information provisions) will not only be addressed in the NC CAM adaptation process. We think it is important to also discuss these issues during the SJWSs on TAR in order to ensure consistency. Furthermore, GasTerra would like to see the issue of mitigating measures and/or predictable tariff development to be included in the Project Plan.	X	Yes, GasTerra thinks it is a good idea to have live streaming of the SJWSs as this will further support stakeholder engagement. However, ENTSOG might consider requiring parties to register for the streaming sessions as well as for the workshops This will allow ENTSOG to evaluate the relevance of participating stakeholders.

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28 Zsolt Hungaria x x We would like to propose that the TAR NC developing project x 28 Zsolt n Gas n Gas Storage Image: Storage	
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Éles n Gas discuss on storage IPs too. We believe the following aspects should Storage Ltd.	
Storage be considered at transmission-storage points: Security of supply is Ltd. a crucial aspect in Hungary because of the single import gas source	
Ltd.	
(80% import dependency in Hungary). The high tariffs at storage IPs	
causes less storage bookings and security of supply was declined.	
Gas storages contribute to system stability. Hungarian storages	
have very important role in daily gas balancing. Such contribution	
and the respective saved costs have to take into consideration to	
avoid cross subsidies between network users storing gas and not storing gas. Storage users have paid an entry fee before entering	
storing gas. Storage users have paid an entry fee before entering the relevant transmission network and an exit fee will be paid upon	
exit there from. Cross subsidies between network users should be	
avoided, which means that the tariffs applicable at storage shall be	
cost reflective. These 3 aspects are of equal importance for the	
integration of the European gas market as cross border trade.	

29 Marc Malbr cke	INTER- an REGIES	CEDEC		x		X	Yes, but given the proposed timeline (see point 4) quality stakeholder involvement will be a challenge.		 x The frequency of two SJWS per month seems very ambitious from experience with the development of other network codes. In our opinion two weeks between sessions does not give ETSOG sufficient time to adapt/develop/ the draft, nor does it allow for stakeholders to prepare qualitative input (no time for feedback within organizations,). Furthermore, the planning does not provide for handling topics that were not discussed or treated in the dedicated session. The global interaction period (not even three months) with stakeholders at the beginning of the development of the NC is too short and should be extended (doubled) by shortening phase 3. 		X	Topics seem OK, but timing is
30 Lajos Butosi	Magyar Gáz Tranzit Zrt.				X	x		x	In order to be able to increase the frequencies and the quality of interractions, propose more virtual meetings which could increase the activity of interractions.	x		In the process NRAs involvme
31 Natalii Rome Seijo			x				Reganosa has been studying for one year the different methodologies on the cost allocation with the University of Santiago de Compostela. We have developed software named GANESO (Gas Network Simulation and Optimization) that simulates and optimizes the flows on a gas network and provides tariffs obtained by the different methodologies studied for that network snapshot. On GANESO, we have implemented all the methodologies and we could choose the different entry/exit split as 50:50 split, different backhaul and different parameters to the secondary adjustment. Reganosa and University of Santiago de Compostela have published an article on Energy Policy where this topic is developed: http://www.sciencedirect.com/scien ce/article/pii/S0301421513008999 Also, we already prove that the capacity-weighted distance approach and matrix approach provide the same tariffs as a result and we are waiting to publish the second article where we evidence it on a mathematical form.	X			-	Reganosa wants to propose t participate actively on this tra network code and to show yo simulations that we could do, that we have obtained after th allocation methodologies. A topics for discussion at each S Allocation and determination allocation methodologies by o adjustments), Capacity and co Interruptible Capacity & Non- Virtual Interconnection Points Recovery, Tariff Setting Year I Factor. • SJWS 3 (14 Mar): VIP Seasonal Factors, Incremental with the selected methodolog (26 Mar): Cost Allocation, Tari Capacity & Non-physical back topics • SJWS 5 (9 Apr): Addit

	X	Topics seem OK, but timing is wrong (see above point 4).	X	
x		In the process NRAs involvment is inevitable.	X	support.
		Reganosa wants to propose to ENTSOG a bilateral meeting to participate actively on this transparent development of the tariffs network code and to show you our software and the different simulations that we could do, as well as to share the conclusions that we have obtained after the last year studying the different cost allocation methodologies. As well, we propose the following topics for discussion at each SJWS: •SJWS 1 (11 Feb): Cost Allocation and determination of reference price (with focus in cost allocation methodologies by country and secondary adjustments),Capacity and commodity Split, Bundled Capacity, Interruptible Capacity & Non-physical backhaul, •SJWS 2 (27 Feb): Virtual Interconnection Points (VIPs), Payable Price, Revenue Recovery, Tariff Setting Year Impact Assessment (IA), Seasonal Factor. •SJWS 3 (14 Mar): VIPs, Transparency, Cost Allocation, Seasonal Factors, Incremental and new capacity and its relation with the selected methodology and secondary adjustment •SJWS 4 (26 Mar): Cost Allocation, Tariff Setting Year IA, Interruptible Capacity & Non-physical backhaul, Revenue Recovery, Additional topics •SJWS 5 (9 Apr): Additional topics and conclusions.	X	

32 Daniel Urban	RWE Ga	-		X	x		x			RWE Gas Storage believes that the topic of tariffs at gas storage e/e points should be given sufficient attention at one of the workshops. We believe that the following specific aspects should be taken into consideration: 1) The fact that users of the transmission network have paid for the use of the network when they entered it and may also pay upon exiting it. The entry to and exit from storages should be therefore significantly reduced or removed altogether. 2) The fact that storage facilities greatly contribute to the stability and efficiency of the grid. These benefits are also shared by those network users who have not booked storage capacity. 3) The fact that storage facilities greatly contribute to security of supply in Europe.
33 Stephen Rose	Supply 8	No but I a participa te in Eurelectr ic and EFET and will be keeping them apprised of develop ments	X							
34 Davide Rubini	Statoil	OGP	x		x		x		x	 x
	Storeng	Y		x			X			As regards section 3.4 (storage) of the final version of the Framework Guidelines, we note that the text has changed as compared to the previous draft version which enjoyed widespread support from stakeholders. As a matter of fact the final text disregards some important aspects that where initially listed as necessary to consider when setting or approving E/E tariffs from and to storage. However, we would like to stress that the items mentioned by the FG should not be treated as an exhaustive list – in fact, the current text is not drafted in that sense. In this context, we would like to reiterate once again the aspects which have been voiced previously by both Storengy and GSE and which should be taken into account by ENSTOG when drafting the Tariff Network Code : • Storage users have paid an entry fee before entering the relevant transmission network and will pay an exit fee. • Storage contributes to system efficiency and optimization, notably in terms of the avoided investment and reduced operating costs of the transmission network. Cross-subsidies between storage users and shippers who do not use storage should be avoided. • The tariffs applicable at storage points shall be cost reflective while taking into account the service rendered. • Storage contributes to security of supply and system stability.

Jan Maaskan t	St			X		x				Gas Storage Netherlands has expressed its concerns on the vague x wording in the framework guidelines in a letter to ACER (and also shared this letter with the European Commission and ENTSOG) of 11 December 2013 . We trust ENTSOG will address the problems identified in the draft ACER impact assessment of September 2012 with regard to the wide variety of treatment of transmission tariffs for gas storage users in Member States, hampering a level playing field and efficient investment. Other problems that were mentioned are the fact that (1) in some entry- and exit systems gas storage users essentially pay entry- and exit tariffs twice and (2) in some Member States benefits of gas storages for the transmission network into account when setting transmission tariffs (such as stabilising the system and contributing to utilisation and investment optimisation by the TSO) are not taken into account . Gas Storage Netherlands would appreciate the point on specific transmission tariffs for gas storages to be added to the agenda for the SJWS (for instance under cost allocation issues) and we trust the network code will contain a meaningful text on specific transmission tariffs for gas storages that will properly address the lack of harmonisation of treatment of specific transmission tariffs for gas storages. A copy of the letter of 11 December 2013 will be sent by email to Ann-Marie Colbert and Jan Ingwersen.	
	Utility IF Support ic Group	IEC/Cef	x			x	х	x		x	
38 Helga Norrby	Vattenfal I			Х							
39 Bryan Henness y	Vayu N Limited	0			x	x	x		x	I think there should be a brief session on the claculation of allowed x revenue. The methodology used by RA's varies significantly. A consistent methodology would be beneficial.	
40 Valentin Höhn	VIK IF Germany Eu	IEC urope		x		x	x	x		x	