

Report on analysis of responses to the Business Requirement Specification for CAM & CMP

Please note: this report covers ENTSG's analysis of responses. The opinions expressed in this document are those of respondents to the BRS for CAM & CMP consultation and not those of ENTSG.

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A. Introduction

On 2 March 2015, ENTSOG published the Business Requirement Specification (BRS) for CAM & CMP and launched a stakeholder consultation which closed on 31 March 2015.

➤ [Business Requirement Specification for CAM & CMP](#)

In order to ensure that the BRS for CAM & CMP contains not only a true reflection of all relevant processes deriving from the Commission Regulation (EU) No 984/2013 (CAM Network Code) and the Commission Regulation (EU) No 490/2012 (CMP guideline), but also a description of the detailed message requirements for developing the following Message Implementation Guideline based on the BRS, the market was asked to provide their opinion on the document during the aforementioned public consultation.

The public consultation was accompanied by a Stakeholder Workshop on the BRS, which was held on 16 March 2015.

This report sets out an abstract of the stakeholder responses. It is intended to provide a conclusion of the opinions submitted in the consultation responses. Within ENTSOG, the report will form an input to the discussions for an amendment of the BRS for CAM & CMP before handing the document over to EASEE-gas in order to start the development of the Message Implementation Guideline.

This analysis report first sets out how ENTSOG carried out the analysis of consultation responses, and gives an overview of the number and type of responses received. Section D of this document then examines each of the key themes covered by the consultation:

- Scope of the BRS document
- Use cases described in the BRS
- Business Requirements for the use cases
- Other issues.

B. Methodology

The presentation of consultation responses is performed in three stages:

1. *Statistical analysis*: provides statistical evaluations of the responses.
2. *Content analysis*: the second section provides a more detailed summary of positions mentioned in the responses. It includes arguments brought up in the consultation and states the respective party or parties mentioning it.

Please note: In this section, equal or similar responses to questions of different respondents were grouped according to ENTSOG's understanding of the arguments mentioned in the individual responses. For specific positions of individual respondents, interested readers are asked to use the document providing all consultation responses published on the ENTSOG website as mentioned above.

3. *Conclusion*: the third section is a summary of the ENTSOG understanding of the market position, taking into account the statistical positions of the respondents and the arguments mentioned.

All responses were treated equally regardless of the type, nationality, size or any other characteristic of the respondent.

Please note: The responses submitted by members of ENTSOG are not taken into account in this report, as they were asked to participate in the relevant BRS Task Force in order to present their opinion about the content of the BRS. Furthermore, comments have not been included in the report if they are either only referring to general process descriptions, but do not have any effect on the message implementation, or when the remarks were raised with the intent to amend the BRS in order to be align with some other already present specifications.

When reading this report, it is important to take the following points into account:

- The numbers in favour of or against a particular position should not be taken as a definitive guide to the market's opinion. For example, a number of respondents may have decided to submit their views collectively via an association rather than responding individually.
- Similarly, the number or strength of arguments put forward may not on its own provide an accurate guide to the views of the market. Those who do not support the option presented in the BRS as the preferred way forward may be more likely to present strong arguments than those who do.

C. Overview of consultation responses

Table 1: Type of respondents

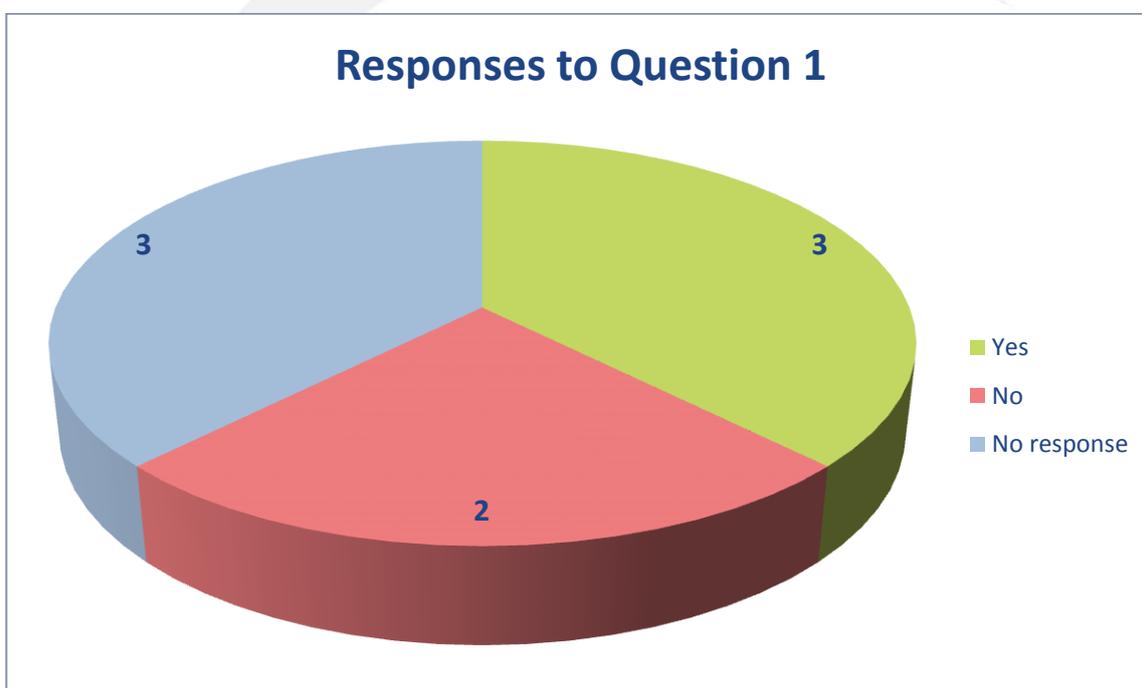
Overall responses received	number	8
European associations	2	<ul style="list-style-type: none"> - PRISMA European Capacity Platform (PRISMA) - EASEE-gas
National associations	1	<ul style="list-style-type: none"> - UPRIGAZ
Network Users	4	<ul style="list-style-type: none"> - EconGas GmbH - EDF Trading Ltd (EDF) - Edison SpA - RWE Supply & Trading GmbH (RWE S&T)
Infrastructure operators	1	<ul style="list-style-type: none"> - Magyar Gáz Tranzit Zrt. (MGT). This company has not been certified as a TSO yet.

D. Themes

D.1 Scope

Question 1: Do you consider that the scope of the business requirements specification is sufficient for the harmonised implementation of the CAM Network Code and CMP Guidelines?

Statistical analysis:



Yes	No	No Response
3	2	3

- Besides the participants who did not submit any response, the number of respondents, supporting the current scope of the BRS, is slightly higher than the number of participants who support a broader scope of the document for the harmonised implementation of the CAM Network Code and CMP Guidelines.

Content analysis:

- MGT considers the scope of the BRS as too focussed on the auction process of the primary capacity and therefore lacking a detailed description of the internal tasks of the actors (like auction Office or TSO).

- PRISMA states that the BRS does not cover fully all processes and data exchange related to CAM NC and CMP guidelines, in particular the heterogeneous capacity categories, the harmonization of technical capacity as principle for the marketing of bundled and unbundled capacity, the competition between two or more interconnection points, the bidding rules in auctions, the re-surrendering of capacity, and the conversion of currencies. Additionally the document does not mention the complex scenario of several Auction Offices managing in parallel credit limits, the allocation of capacity products to Network Users, or the bidding in auctions by Network Users.

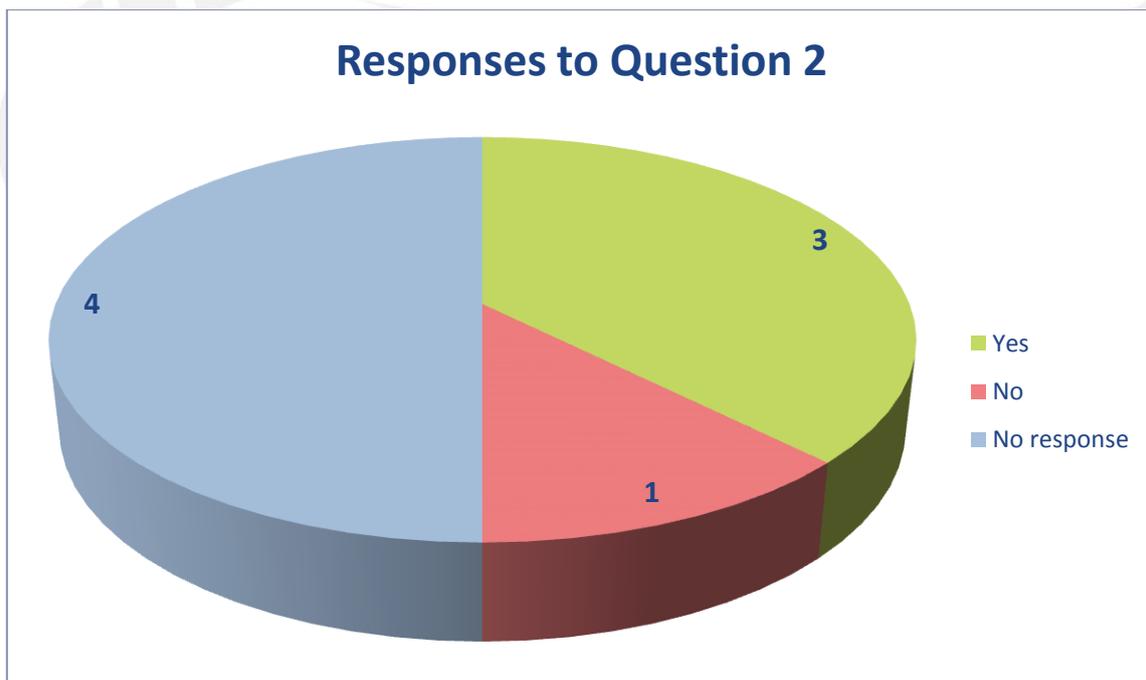
Conclusion:

A slight majority of participants considers the scope of the BRS as sufficient, however a broader scope including a more detailed description of processes is deemed as needed in some parts of the document in order to meet the expectations raised in the consultation.

D.2 Use cases

Question 2: Does the “Overview of the CAM/CMP process use case” [see Figure 1 in the BRS document] and list of actors adequately represent the business process behaviour? If not, please suggest improvements.

Statistical analysis:



Yes	No	No Response
3	1	4

- Despite the participants who did not respond to that question, the vast majority of respondents see the Overview of the CAM/CMP process use case and the current list of actors as adequately representing the business process behaviour.

Content analysis:

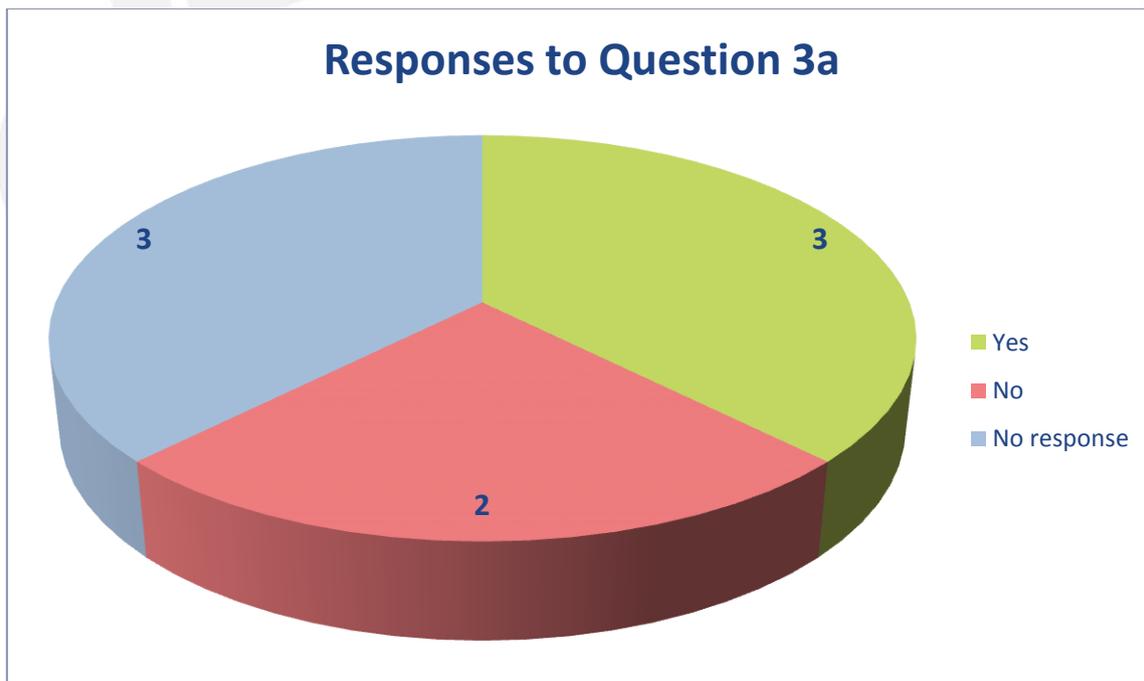
- MGT has the opinion that the role of the Auction Office should be clarified with regard to the responsibilities of the TSO.

Conclusion:

The overview of the CAM/CMP process use case in the BRS and the proposed list of actors represent the business process behaviour. No amendments are necessary for this chapter of the document.

Question 3a: Are the use cases for Network User Registration sufficient (section 3.2.1)? If not, please suggest improvements.

Statistical analysis:



Yes	No	No Response
3	2	3

3	2	3
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- Next to the participants who did not submit any response, more than half of the respondents judge the use cases for the Network User Registration as sufficient.

Content analysis:

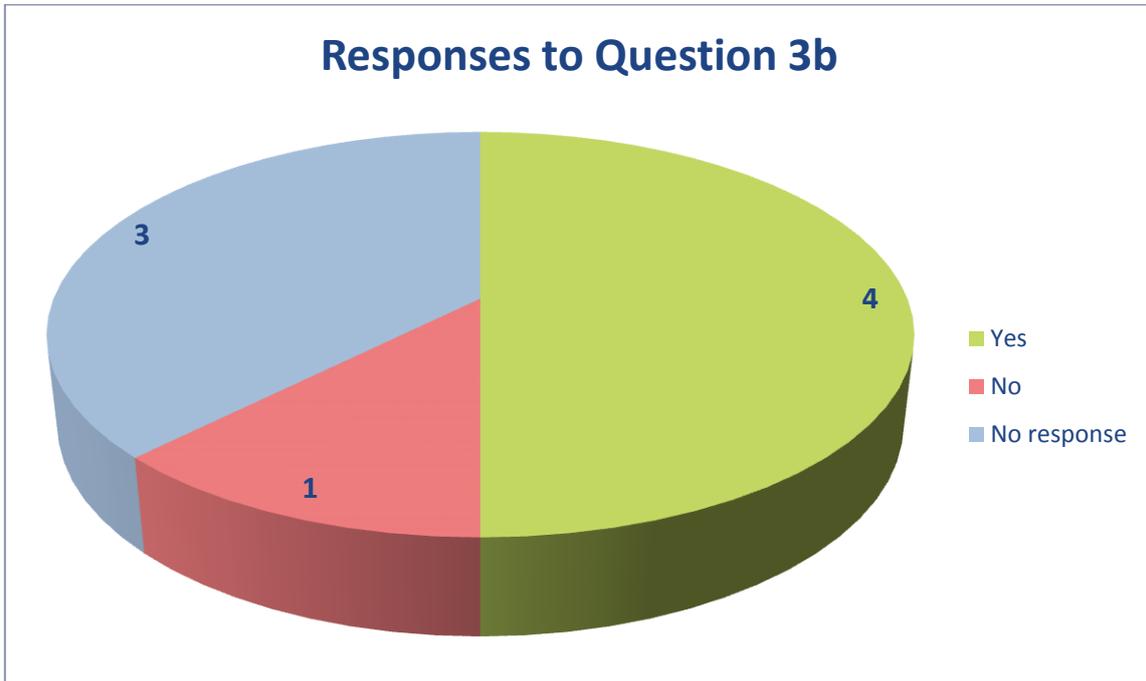
- MGT considers the registration process and information flow outlined in the BRS as complicated and suggests that only the TSO manages the registration process with a Network User.
- PRISMA adds that the registration of a Network User is needed for surrendering capacity or for participating in the secondary market, too. Furthermore, PRISMA points out that the TSO can also provide the Balancing group used by a Network User to the Auction Office and not only the Network User itself. Moreover, the approval/rejection information regarding the registration from the TSO to the Network User may be transferred via the Auction Office.

Conclusion:

In general, the use cases for Network User Registration are described sufficiently in the BRS. Nonetheless, some amendments regarding the involvement of actors have been proposed.

Question 3b: Are the use cases for Bookable point Registration sufficient (section 3.2.2)? If not, please suggest improvements?

Statistical analysis:



Yes	No	No Response
4	1	3

- The majority of participants rate the description of the use cases for the Bookable point Registration as satisfactory.

Content analysis:

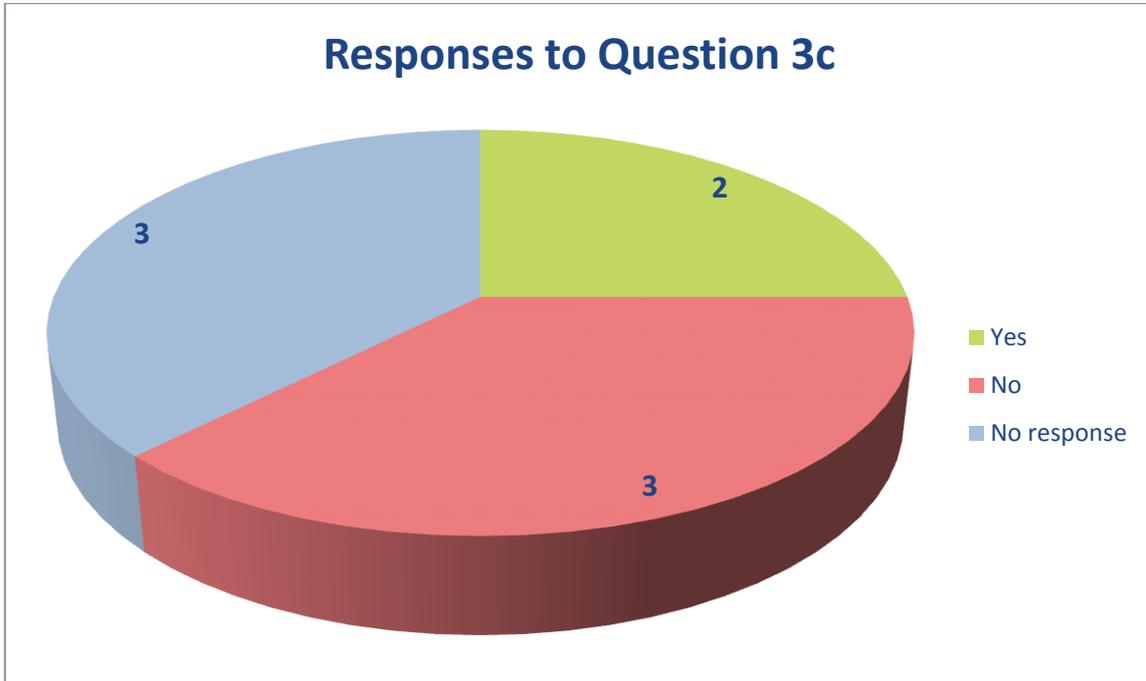
- MGT and PRISMA suggest that the process for the Bookable point registration should include a clarification of the type of the bookable point, like interconnection point or exit/entry point.
- PRISMA also mentions that the BRS misses the description of a bundling process for network points.

Conclusion:

The BRS lays out the use cases for Bookable point Registration in a sufficient way, but some additional information for the registration process could be included according to the received feedback.

Question 3c: Are the use cases for Secondary market operation sufficient (section 3.2.5)? If not, please suggest additions.

Statistical analysis:



Yes	No	No Response
2	3	3

- Despite the participants not providing any answers, over half of the respondents consider the use cases for Secondary market operation as insufficient.

Content analysis:

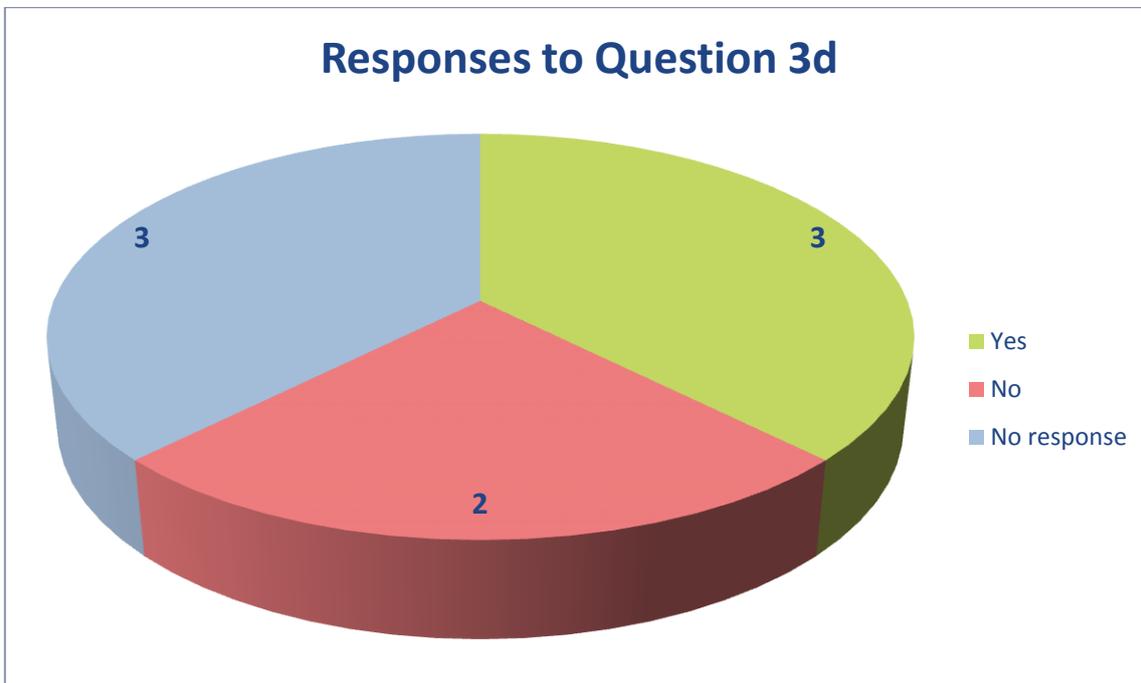
From PRISMA’s point of view, the BRS lacks the differentiation between “assignment” and “transfer of use”. Likewise, a differentiation between the various forms of secondary trading, like over the counter or call for orders is missing. PRISMA also answered that responding shippers who sells capacity on the booking platform operated by PRISMA has to specify the underlying contract, too.

Conclusion:

The use case for Secondary market operation is considered as amendable, missing some information in the current description in the BRS.

Question 3d: Are the use cases for Credit limit Management sufficient (section 3.2.6)? If not, please suggest improvements?

Statistical analysis:



- More than half of the respondents participating in the consultation are of the opinion that the use cases for the credit limit management is adequate, whereas one third of the overall number of participants did not provide any answers.

Content analysis:

- EDF suggests that the credit requirements and the credit limit management should be centralised at the Auction Office level.
- PRISMA thinks that the description of the credit limit management should be more precise in the way that the used value is amended, not the credit limit itself. Additionally auction platforms may allow credit factors applying to secondary trades can be more than one depending on the duration of the trade. The transmission of the „framework" by the TSO to the Auction Office as part of the credit limit is not described comprehensively in the BRS.

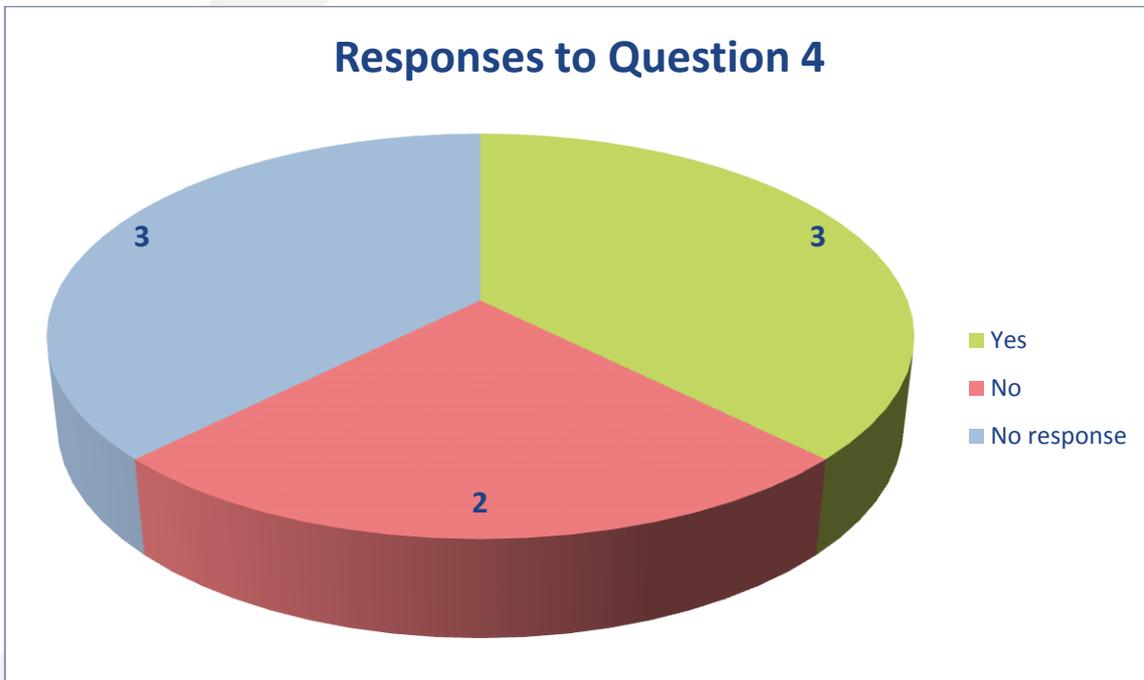
Conclusion:

The credit limit management processes still offers some space for further improvements, albeit the overall process as laid out in the BRS appears to be accepted.

D.3 Business requirements

Question 4: Do you agree that the information flow described under the section 3.3 of the BRS document is exhaustive and will capture all necessary requirements arising from the use cases, especially Bookable point administration process/ Network User registration process / Secondary market transfer process? If not, please suggest improvements.

Statistical analysis:



Yes	No	No Response
3	2	3

- Not taking into consideration the “no response”-feedback, the responses received give the impression that the majority of the participants accept the information flow descriptions especially for the Bookable point administration process, the Network User registration process and the secondary market transfer process without reservation.

Content analysis:

Bookable point administration

- MGT questions what kind of information of the bookable point the Auction Office will validate after the TSO sends the bookable point information, as from MGT's point of view it is not clearly stated in the BRS.
- PRISMA is missing a reference to the Secondary Market and to the surrender in this chapter of the BRS.

Network User registration process

- PRISMA is missing a reference to the Secondary Market and to the surrender in this chapter of the BRS. Moreover, PRISMA suggests to clearly mark in the BRS that the Network User - TSO registration and the Network User - Auction Office registration are two independent processes. Additionally, PRISMA favours to delete any detailed description in the BRS that indicates a certain registration order: the Network User – TSO registration or the Network User-Auction Office registration.

Surrender capacity process

- PRISMA states that from its point of view the description of the re-surrendering and market-ed-surrendered capacity is too general in the BRS and may not correspond to the responsibilities of the TSO.

Secondary market process

- PRISMA considers the process description missing several steps, as the secondary market process is only described as bilateral between the Network Users and the TSO without any involvement of an Auction Office.

General Acknowledgement process

- PRISMA proposes to delete the General Acknowledgement process description from the BRS.

Auction process

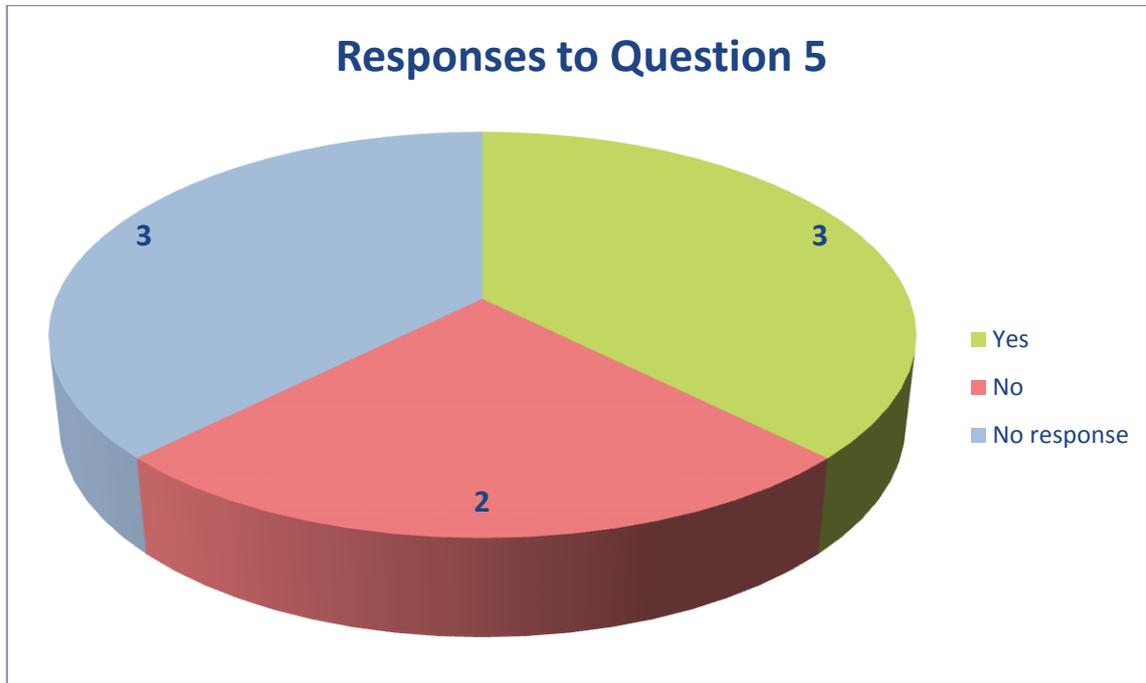
- PRISMA criticises the too general rules published in the BRS for the installation of a new bidding round in case of exceeding demand. From PRISMA's point of view, the description is not CAM compliant and should be cancelled.

Conclusion:

Notwithstanding some requested adjustments of several described processes, the information flow presentation in the BRS is largely accepted.

Question 5: What additional business requirements should be included or which business requirement specified in more detail?

Statistical analysis:



Request for amendment of business requirement	No further requests for amendment of business requirement	No Response
3	2	3

- Not considering the participants submitting no response, a slight majority considers the BRS as complete and not missing any further requirements.

Content analysis:

Bookable point administration

- MGT wishes for a more detailed description of the Bookable point administration process.

Auction capacity

- MGT wishes for a more detailed description of the Offered capacity process.
- PRISMA submitted remarks on several business requirements. In the step for the determination of the offered capacity, PRISMA misses the reference to possible (implicit) competitions or 1-n bundles. Besides the aforementioned points, following PRISMA's understanding of the document, the BRS does not take into account multiple firm and interruptible capacity types or rules for type combination. Furthermore, any reference to the harmonisation as defined in the CAM Network Code article 19 point 5 (a) and (b) is missing. Furthermore, other Congestion Management Procedures should be included, like Use it or lose it or Oversubscription. Concerning the surrender of capacity, it is emphasised that the BRS does not foresee

any validation of the surrender requests by the Auction Office. Further issues raised by PRISMA are that the TSO may also apply a starting price differing from the reserve price, and that the price for the bidding round could be composed of both small and large price steps. Here the BRS seems not to be elaborate enough.

Bid for capacity

- PRISMA also suggests to delete the description of the bidding rules as from PRISMA's point of view the process is much more complex as it is described in this chapter of the BRS. A reference to the relevant articles in the CAM Network Code 2013 is considered as the better alternative. Besides, the chapter in the BRS on cancelling a bid seems not considering the special cancellation constraints in the first undersell window. Therefore, PRISMA proposes to include references to the relevant articles in the CAM Network Code. Finally yet importantly, according to PRISMA, the document does not mention that the Auction Office transmits the intermediate results of the auction to the TSO at the end of the allocation process.

Capacity Buy back

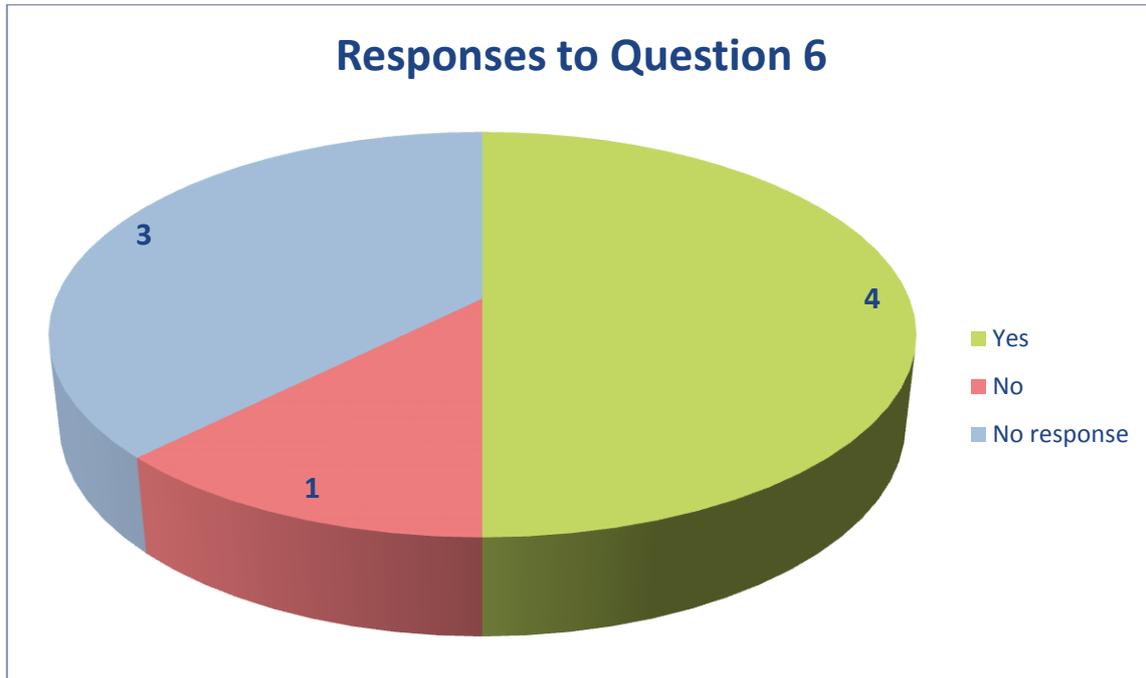
- PRISMA gives the hint that a buy back can actually start before any nominations are received, for example in case of long term maintenance. Besides, the section dealing with the submission of buyback requirements does not contain references to different types of buy back auctions. It refers to capacity buy back, but not to flow commitments as far as PRISMA understands.

Conclusion:

In general, the BRS appears to be sufficient for further development of the Common Network Operation Tools. Nonetheless, requests were raised to describe certain processes in more detail.

Question 6: Do you consider the list of definition defined under the section 3.5 "Definitions of the attributes" sufficient for the information requirements? If not, please suggest additions.

Statistical analysis:



Yes	No	No Response
4	1	3

- The vast majority of the participants agree with the list of definitions published in the BRS, but some suggestions for improvements have been transmitted as well.

Content analysis:

- PRISMA signals that some definitions need to be clarified according to its understanding.
 - Account: The difference between the definition of account and of the attribute InternalAccountIdentification is unclear.
 - AuctionIdentification: The difference to the definition of BiddingRound is not elaborated sufficiently.
 - AvailabilityType: Besides the AvailabilityType, no other types are defined.
 - BidIdentification: PRISMA points out that in its opinion the BidIdentification is assigned by the Auction Office instead of the Network User.
 - BidPrice: The definition does not clearly explain if the bid price is only the surcharge or the sum of surcharge and regulated tariff/starting price.
 - BookablePoint: The difference between the attributes BookablePoint, ConnectionPoint and InterconnectionPoint should be more highlighted.
 - ContactType: PRISMA states that it does not have contacts such as "type trading".
 - InternalAccountIdentification: The difference between the definition of account and of the attribute AccountIdentification is unclear.

OfferedCapacity: The definition is too detailed; the definition should only contain the explanation that the offered capacity is determined by the TSO taking into consideration Congestion Management Procedures.

ProductIdentification: The definition is unclear.

Rate: This attribute should be defined as the split factor.

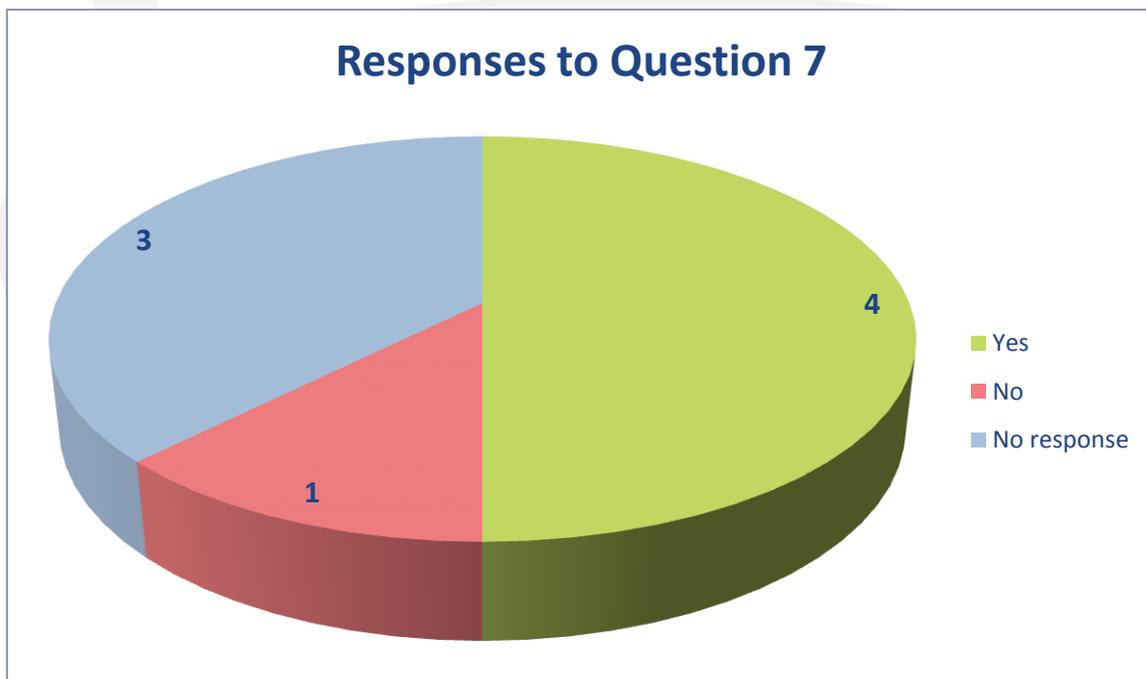
Moreover the definition of the attribute “name” as well as of “status” used in the class figure for the Bookable point administration requirements is missing in the BRS.

Conclusion:

Even though most definitions in the BRS appear to be adequate, amendments to or the clarification of some definitions have been proposed.

Question 7: Do you consider the section 3.6 “Requirements per process” for the processes exhaustive, especially Bookable point administration process / Network User registration process / Credit limit process/ Secondary market transfer process? If not, please suggest additions.

Statistical analysis:



Yes	No	No Response
4	1	3

- Despite the fact that almost one third of the participants in the survey did not submit any responses, a clear majority of respondents' think of the requirements per process outlined in the BRS as sufficient.

Content analysis:

- PRISMA is missing some processes in section of the. From its point of view, this chapter is therefore not sufficient to cover all processes and their complexity on a booking platform. In addition, PRISMA asks for a more specific document containing all message (attributes and definitions) information.

Bookable point administration

- MGT emphasises that the use of the sequenceIdentification is unclear and that the description in the document does not specify what this attribute stands for.
- According to PRISMA, the difference between the attributes identification, sequenceIdentification and name seems to be unclear.

Network User registration process

- MGT regards the used flow diagram as confusing concerning the used identification as well as regarding the addressee of the transmitted information.
- PRISMA supposes that the account seem to be associated to the TSO, but it should be related to the Network User. Furthermore, the account attribute should be marked as "0...*" as not all TSOs use balancing groups. Besides, PRISMA asks if the identification represents the EIC. The content of the remark in the middle of the figure is also not clear to PRISMA.

Offered capacity process

- PRISMA is missing a differentiation between long price steps and short price steps. In addition, the booked capacity that is sent to the Auction Office for the harmonization as laid out in the CAM Network Code article 19 point 5 (a) and (b) is missing.

Surrender capacity process

- PRISMA underlines that the BRS are missing a message from the Auction Office to the TSO after the surrender request has been made by the Network User. In this message, the "Time stamp" should be added in order to allow a precise allocation in case more than one Network Users surrender capacity for the same period of time. In figure 24 it is not clear to PRISMA what this diagram refers to.

Auction process

- PRISMA has the following remarks concerning figure 25 containing the Bid information requirements: First of all, the BidIdentification is sent by the Auction Office and not by the Network User. Secondly, several attributes and parameters are missing, i.e. the e-mail attribute of the "Shipper User", the conversion attributes, the account and the Check box with the "approval of the General Terms & Conditions of the TSO". In figure 26, showing the de-

tailed capacity allocated information requirements PRISMA misses the attributes account and the conversion attributes. Moreover, PRISMA responded that from its point of view the attribute ClearingPrice seems to be the sum of both TSO's regulated tariffs + premium paid by Network User on both sides of connection point. In the way it seems to be laid out in the document, it is not possible to calculate the auction premium assigned to one TSO.

Secondary market transfer process

- PRISMA emphasises that the initiator or the target can not clearly be identified in figure 30.

Credit limit process

- PRISMA suggests that the association between the Network User and a credit limit is 1 to n.

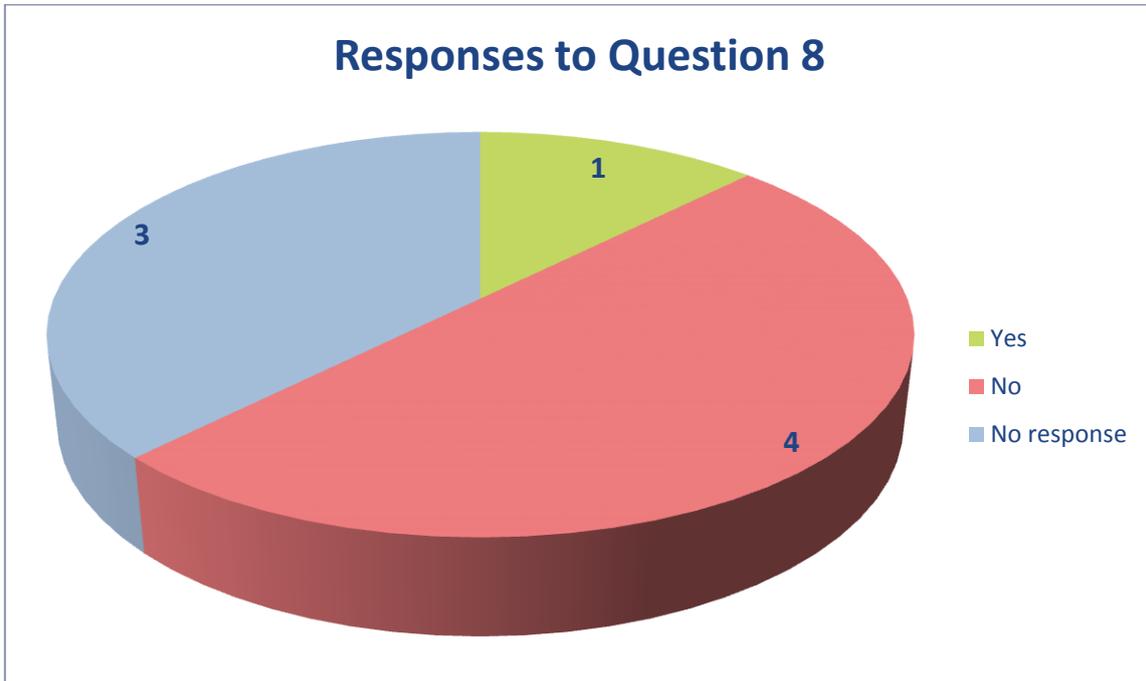
Conclusion:

The requirements for certain processes mentioned in the BRS are commonly seen as sufficient, however some amendment proposal have been raised.

D.4 General

Question 8: Do you have any other comments or suggested improvements to BRS for CAM Network Code and CMP Guidelines? If yes, please provide them here.

Statistical analysis:



Yes	No	No Response
1	4	3

- The number of answers expressing that no further comments or improvements of the BRSs are necessary and the number of participants submitting no answer are higher than the number of respondents who indicated that the content BRS is not sufficient yet.

Content analysis:

- The participants in the consultation have not submitted any additional improvement suggestions or amendment proposals.

Conclusion:

External stakeholders consider the overall document as sufficient. Further improvements of the BRS for CAM & CMP are not necessary.

E. Process following the public consultation

ENTSOG appreciates the involvement of stakeholders by responding to the public consultation of the BRS document for CAM & CMP.

As explained in the introduction part of this report, the objective of this document is to summarise the arguments provided by the consultation respondents and to reflect the positions on the described processes in the BRS as understood by ENTSOG. It contains no commitment from ENTSOG on how the consultation responses will affect the BRS for CAM & CMP or the Common Network Operation Tools for CAM & CMP, consisting of the BRS and the Message Implementation Guideline (MIG).

Nonetheless, ENTSOG will certainly take into account all responses and check if an amendment of the BRS document is necessary before handing it over to EASEE-gas for the development of the MIG. ~~The delivery of the BRS to EASEE-gas is expected in June July 2015.~~ EASEE-gas will then conduct the MIG development ~~until the end of June 2015.~~ ~~The publication of the Common Network Operation Tools for CAM & CMP by ENTSOG is scheduled for November 2015.~~

For additional information on the next steps and timeline, please review the timeline provided in the Stakeholder Workshop's presentation for BRS for CAM & CMP published on the ENTSOG website [here](#).