

## *ENTSOG's AWP 2014 Consultation Initial Proposal*

### **Executive Summary of Feedback**

#### **Q1: Does the programme identify the correct projects for ENTSOG's focus in the 2014 AWP?**

(Summary including ENTSOG's position in **bold**)

All stakeholders agree on the identification of the right projects for the AWP 2014.

However, further comments suggest, in collaboration with ENTSO-E, to take the gas supply flexibility into consideration (infrastructure when it comes to changing supply patterns) and identify potential investment gaps. **In the course of the TYNDP 2015-2024 ENTSOG will work on reasonable assumptions in the course of the R&D plan in the beginning of 2014.**

Business rules specification and message definition proposals should not only refer to interoperability activities as the PRISMA platform currently relies on interactive web-based communication.

**ENTSOG is already obliged to do this when necessary and in the form necessary.**

A stakeholder expressed expectation to contribute to the CAM network code proposal to deliver incremental capacity and associated market-test rules.

Some other input suggested the development of a process for reviewing network codes and changing them. **ENTSOG will give, following on from its development activity, attention to how it can contribute to ensuring coherence and consistency of codes particularly as changes process**

The positive experience with simulation sessions (during development phase for CAM network code) should be adopted to provide stakeholders the best understanding. **ENTSOG will continue to work with stakeholders in the most appropriate ways. For example it is envisaged that ENTSOG will deliver some sessions to cover more detailed aspects of the tariff proposals so that stakeholders can better appreciate the impacts of some of the tariff framework guideline aspects, and their interactions, during the tariff code development process.**

With the start of the implementation of network codes it is seen important that a consistent approach is maintained (ACER, ENTSOG) and a clear and common interpretation of the network codes is in place.

It is seen important that ENTSOG's Transparency Platform incorporates all REMIT-specifications to enable transparency and the disclosure of inside information. **Implementing acts by the commission are expected to define roles. The responsibility regarding the disclosure of information is not on the platform side but on the market participants.**

## Q2: Other activities that should displace the focus areas identified?

A stakeholder requests ENTSOG to develop a detailed roadmap on the future operation of the transparency platform including some content that goes already beyond the regulation. **By 1<sup>st</sup> of October a new transparency platform will be available. ENTSOG together with the TSO's is doing its best to improve each point and the quantity data on the transparency platform. A project for the upgrade of the platform is on-going.**

"Gas hub operation" and "Rules for trading" were suggested by a stakeholder to be addressed as other priorities. **The "Rules for gas trading" are already identified for scoping activity in the EC's three year plan and both stakeholder and ENTSOG can be made to that process to ensure that the work is properly framed.**

Another stakeholder suggestion to improve consistency (e.g. triggered by CEER) would be the setup of Guidelines for Good Practice for Credit Arrangements in relation to TSO Transportation and Balancing Services. **Some of the points are already covered in the BAL NC in a high level format but ENTSOG will contribute to these discussions when necessary.**

ENTSOG always monitors its activity in order to ensure compatibility between the different NC. Anyhow, the "Rules for trading" give room for further exploration.

Any NC is evaluated regarding its benefits to the market in the course of an impact assessment process adopted by the EC.

## Which elements of the plan should be displaced?

A suggested re-examination of priorities of ENTSOG's work is referred to the priority list of the commission (to be addressed there during consultation phase) which serves as orientation within ENTSOG.

**Q3: Are the objectives and deliverables associated with each plan realistic?**

ENTSOG's working method and stakeholder consultation is appreciated. Layout, timetable and text of the AWP 2014 are seen logical and comprehensive.