

## 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](mailto: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

<b>Name</b>
First and Last Name:

<b>Organisation</b>
Company/Organisation Name:
Job Title:

<b>Contact details</b>
Email:
Tel:
Mobile:
<b>Address</b>
Street:
Postal Code:
City:
Country:

### 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 type="checkbox"/>	Other (please specify)

**PART A – Feedback on TYNDP 2015**

**1. Infrastructure Chapter**

In which extent this chapter meets your expectations?				
Poorly:	<input checked="" type="checkbox"/>	Sufficiently:	<input type="checkbox"/>	Perfectly:
Which parts of this chapter you particularly appreciate, if any?				
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion? The TYNDP does not provide any information regarding investments costs related to each infrastructure scenario and their incremental impact on regulated tariffs. Although the financial data are collected for the CBA step, they are not made public at any time during the whole process because they are considered commercially sensitive. Both benefits of SOS/diversification and cost are equally important to make investment decisions and therefore both should be considered equally in the TYNDP.				

**2. Barrier to investment Chapter**

In which extent this chapter meets your expectations?				
Poorly:	<input type="checkbox"/>	Sufficiently:	<input checked="" type="checkbox"/>	Perfectly:
Which parts of this chapter you particularly appreciate, if any?				
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion?				

**3. Demand Chapter - Analysis of historical demand**

In which extent this section meets your expectations?				
Poorly:	<input type="checkbox"/>	Sufficiently:	<input checked="" type="checkbox"/>	Perfectly:
Which parts of this section you particularly appreciate, if any?				

<p>Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?</p>
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**4. Demand Chapter - Definition of scenarios to be used in the Assessment Chapter**

In which extent this section meets your expectations?				
Poorly:		Sufficiently:	X	Perfectly:
Which parts of this section you particularly appreciate, if any?				
Which parts of this section should be particularly improved in next edition, if any? If yes, do you have any suggestion?				

**5. Supply Chapter - Analysis of historical supply**

In which extent this section meets your expectations?				
Poorly:		Sufficiently:	X	Perfectly:
Which parts of this section you particularly appreciate, if any?				
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:	X	Perfectly:
Which parts of this section you particularly appreciate, if any?				

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

Infrastructure considered in each supply scenario should be provided.

### 7. Assessment Chapter

In which extent this chapter meets your expectations?				
Poorly:	X	Sufficiently:		Perfectly:

Which parts of this chapter you particularly appreciate, if any?

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

1. Considering LNG as a single source involves ignoring both price diversification and security of supply different LNG sources can deliver. It is not realistic to consider the interruption of the whole LNG production at different parts of the world at the same time and discard price competition of different LNG sources. Therefore although this simplification made the analysis much easier it leads to pointless results regarding LNG.
2. The assessment of flows and indicators is based on a theoretical definition of supply curves for each source. The definition of these curves is based on some assumptions which are not justified (for instance, price ranges for pipe gas sources and LNG) and does not take into account certain market circumstances and dynamics which heavily influence gas prices. Therefore the results of the analysis may not be as consistent as desired.
3. The use of balancing zones as the basic unit of the model or “nodes” does not take into account national transport restrictions. The use of hydraulic simulation tools could help to identify congestions preventing gas supply from covering national demand or flowing to other countries.
4. GNF would appreciate more detail on how underground storages have been modeled including levels of stock, withdrawal/injections capabilities and their evolution through the

injection/withdrawal cycle.

**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:	<input checked="" type="checkbox"/>	Perfectly:
Which layout elements you particularly appreciate, if any?				
Do you have any specific concerns regarding the layout of the report? If yes, do you have any suggestion? An annex containing a map per scenario with flows at each interconnection point would help to understand the results.				

**9. Stakeholder engagement process**

Do you consider that ENTOSOG offered you sufficient opportunity to be involved in TYNDP process?				
Yes:	<input checked="" type="checkbox"/>		No:	
Have you taken part in any public workshop or Stakeholder Joint Working Session related to TYNDP 2015?				
Yes:			No:	<input checked="" type="checkbox"/>
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 ENTOSOG could improve the engagement process?				

**10. General comment**

What is your overall appreciation of TYNDP 2015?								
Very poor		Poor	<input checked="" type="checkbox"/>	Average		Good		Very good
Do you have any additional comment on the extent in which TYNDP 2015 meets your expectations? Although the TYNDP contains very valuable information such as demand scenarios and technical infrastructure data we miss an assessment of the impact of infrastructure developments on								

regulated tariffs.  
Regarding LNG, the conclusions of the report cannot be valid as long as the simplification of considering LNG as a single supply source is made.

## 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/NO
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/NO
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/NO
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/NO
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/NO
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...)?	
Other (please describe):	

**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.

Do you agree with this approach? If not, please explain why	YES/NO
Do you see other environmental perspectives that could be addressed in TYNDP assessment?	
If yes, what could be a methodology to address them?	

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#### 14. Streamlining of the methodology

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	X	Not comprehensiveness enough	
If too complex, which part of the assessment could be removed from the methodology? Although there is a right balance between complexity and comprehensiveness, the methodology could be better explained.					
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

<p>What should be the priority direction(s) of improvement for the next edition?</p> <ol style="list-style-type: none"> <li>1. Considering all LNG supply sources instead of one single source.</li> <li>2. Providing information about impact of different infrastructure scenarios on regulated tariffs.</li> </ol>
<p>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?</p>

