

ENTSOG's AWP 2014 Consultation Initial Proposal

Feedback Proforma

Please use the subsequent template for Stakeholder feedback to the ENTSOG 2014 Annual Work Programme document.

Please complete and send the template and or any other feedback to vittorio.musazzi@entsog.eu and to info@entsog.eu by September, 7th 2013.

Organisation	European Federation of Energy Traders (EFET) 
Name	Maria Popova, Policy and Communication Associate

Q1: Does the programme identify the correct projects for ENTSOG's focus in the 2014 AWP?	
YES	NO
Further comments	
We broadly agree with the priorities identified by ENTSOG in the consultation document, but would urge ENTSOG to include two other projects requested by market participants (See our responses to Q2).	

Q2: Are there any other activities that should displace the focus areas identified?

YES

If „YES“, what other priorities should be addressed?

Gas hub operation

An additional area that would benefit from improved clarity and consistency is the approach taken to gas hub operation in different parts of Europe. We believe that there needs to be shared understanding of the structure and operation of gas trading hubs, so that the roles of TSOs, exchanges, other trading platforms and brokers are not confused with the specific duties and services of a hub operator. We do not see the need to develop an EU regulation on this, but it would be worthwhile to develop guidelines for good practice for hub operators (GGPHO). In our view, CEER would be the most appropriate body to lead on the development of such guidelines. ENTSOG's expertise in this context would be crucial. EFET would be happy to contribute to the development of the GGPHO, as well as to the overall EU gas network code development process for the topics that we have identified in this short response.

Rules for trading

At the Madrid Gas Forum in April 2013, the regulators promised that there would be full transparency of the differences in contractual terms and procedures on either side of each IP where bundled capacity products are proposed. In our view, work is definitely required in this area. This work should identify all contractual and procedural differences that could affect the capacity rights and obligations, and then set out plans to resolve those differences that reduce the value of capacity if the existing contracts and processes were to remain unchanged when bundled capacity products are offered. Specific differences that may need to be addressed include:

- Definition of firm capacity and access from or to the Virtual Trading Point
- Definition of FM and emergency provisions if they affect firm capacity rights
- Right to nominate/re-nominate use of capacity, including timing & procedural issues
- Credit arrangements
- Impact of planned and unplanned maintenance on capacity rights
- Dispute resolution procedures
- Notifications, billing and payment
- Any other rights or obligations between the capacity holder and TSO that have a material impact on the value of capacity at IPs.

In that regard, Guidelines for Good Practice for Credit Arrangements in relation to TSO

Transportation and Balancing Services developed by CEER, for instance, would be a useful tool for improving consistency. ENTSOG's contribution in that regard would also be valuable.

Which elements of the plan should be displaced?

ENTSOG should prioritise and re-examine the allocation of resources to ensure the fulfilment of its statutory duties and functions associated with topics identified in Q2. The topics in Q2 should take priority over any non-statutory work that ENTSOG is considering.

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

YES	
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Further comments

ENTSOG encourages stakeholders to provide any additional feedback on any of the plans to help us in shaping the development of all our processes.

ENTSOG welcomes comprehensive feedback as critical part of ENTSOG Work Programme and appreciates your effort and time spent to complete this form.