

## *ENTSOG's AWP 2017 Consultation Initial Proposal*

### **Feedback Template**

Please use the subsequent template for Stakeholder feedback to the ENTSOG 2017 Annual Work Programme document.

Please complete and send the template and or any other feedback to [general-manager@entsog.eu](mailto:general-manager@entsog.eu) and (in cc) to [ENTSOG.communications@entsog.eu](mailto:ENTSOG.communications@entsog.eu) by 05 August 2016 (end of business day).

<b>Organisation</b>	UPRIGAZ
<b>Name</b>	Michel ROMIEU

<b>Q1: Does the programme identify the correct projects for ENTSOG's focus in the 2017 AWP?</b>	
YES	
<b>Further comments</b>	
<p>UPRIGAZ is pleased to endorse ENTSOG'S program for 2017 and suggest to focus on the two following main issues :</p> <ul style="list-style-type: none"> <li>- Gathering all the necessary data for REMIT on the transparency platform, in accordance with art. 8 REMIT regulation</li> <li>- Enhancing the transparency of CBA through publication of results for each important infrastructure, in particular MIDCAT project</li> </ul>	

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

YES

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

UPRIGAZ considers as a priority for ENTSG to explore the consistency of the level of development of gas infrastructures in its TYNDP with the status of actual forecast of gas demand across Europe and to cooperate with EU Commission with a view to :

- Raising the issue of the lack of feasibility of the TYNDP in a context or regression of the gas demand in Europe and the forecast of additional LNG supply

**Which elements of the plan should be displaced?**

No element of the plan has to be displaced. Fostering the gas demand through a more proactive EU policy towards the gas sector should be taken into account as a clear priority.

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

NO

**Further comments**

Since 1973, when Russian gas exports to Germany and Italy commenced, gas demand in Europe grew without interruption for almost four decades.

However in the last years the market has suffered unprecedented pressures and gas sales especially to power generation have slumped. Pressure from a combination of cheap coal imports and government policies to give preferences to renewable generation has seen a major decline in gas use in power generation. As a result gas demand in Europe has fallen and the outlook will depend on the EU energy policy, in particular concerning the ETS system and emission performance standard for new power facilities.

In this context, UPRIGAZ has serious doubts on the capacity of operators (TSOs, DSOs, Storage operators and LNG terminal operators) of achieving any additional significant investment programme unless they receive clear signals through a change in the EU policy in favour of gas.

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.