ENTSOG Interoperability and Data Exchange Rules Network Code
SJWS 2

28 Nov 2012, 10:00 – 16:00

at Thon Hotel EU, Rue de la Loi/Wetstraat 75, 1040 Brussels
1. Opening (P. Panousos) (10:00 – 10:15)

Mr Panagiotis Panousos, Business Area Manager System Operation and Interoperability Project Team Manager, thanked all stakeholders for their participation and encouraged them to continue their constructive engagement throughout the whole Network Code (NC) development process. He also welcomed the participants taking part via webcast and invited them to give their feedback and comments via email. Mr Panousos informed about finished activities (Kick-off Workshop, Project Plan with Consultation Responses Report, Launch Documentation as well as pre-reading Business Rules) and future activities for NC development (next SJWS, Prime Mover and Trilateral meetings; draft NC). Mr Panousos also gave a short feedback from the first SJWS that took place on 14th of November.

2. Data Exchange Selection process (10:15 – 11:15)

- Introduction: Data exchange and business processes (J. De Keyser ENTSOG)
- Data Exchange – Network code Development process (Y. Jones ENTSOG/Gaslink)
- Communication Types and technologies (D. Serruys ENTSOG/Fluxys)

3. Data Exchange Solutions and Roadmap (11:35-13:30)

- Selection criteria & Proposed communication (D. Mazzotti ENTSOG/SNAM)
- Migration Roadmap proposal (C. Hamilton ENTSOG/Nat. Grid)

Questions Data Exchange Selection process, Solutions and Roadmap

- Q (Chris Logue): What will be included in the data exchange part of NC? Will the protocol for example be in the NC?
A (ENTSOG): NC shall contain the “toolbox” that can be referenced to in other NCs according to the business requirements. We would suggest to avoid too much technical details in the NC. But this is one of the points under discussion.

Q (Chris Logue): Naming the protocol to be used in the NC is too much technical detail and should be avoided. The NC should describe a process to define the solution but not specify the solutions.

A (ENTSOG): We must identify the basic tools for “HOW” to communicate (i.e. the protocols). Stability is essential for the data exchange in daily operations. The NC needs to be in line with FG.

Q (Chris Logue): Noted that the FG states that the Code shall “foresee” common solutions, rather than defining them.

Q (Steve Rose): Will the implementation guide be published?

A (ENTSOG): This document will be published on ENTSOG’s website.

Q (Peter Meeuwis): AS4 is currently mentioned in the draft documents. AS2 is “proven technology” and is in use in a lot of EU Member States. Proposal to start with AS2 and implement AS4 at a later stage, when more experience is built.

A (ENTSOG): The selection of the protocol is still open and subject to a technical evaluation process. Today we have to make a choice for the future. Not everybody is using AS2 which would lead to a non-harmonised solution. ENTSOG will take all feedback into consideration. A transition period is proposed during which the current technology can be used but newcomers have not to implement “old solutions”. In this period both technologies will co-exist.

Q (Peter Meeuwis): CAM and BAL NC will have to be implemented sooner than the INT NC. What will we do for these NCs?

A (ENTSOG): INT NC will define the tools for HOW to communicate. The WHAT is linked to the business processes of the individual NCs. The implementation time for the mentioned codes is more or less in line with the time of entering into force of the INT code.

Q (Thomas Deuschle): Involvement of the DSOs in the process. Do they have to implement, are they involved in the consultation of the format?

A (ENTSOG): Interoperability NC is a supporting code. Most business processes defined in the other NCs/Guidelines are focussed on Interconnection Points. If
DSOs are involved in these processes they can participate in the NC development process. ENTSOG has a transparent and open process where involvement of all stakeholders is welcomed.

> Stakeholders’ view (EFET - Filip Sleeuwagen)

  o Move forward towards full harmonization advocated; format-content and communication. Huge investment needed but it pays-off.
  
  o Processes for new business activities and choices of future standards have to guarantee stakeholders involvement and set clear targets.
  
  o EFET welcomes the approach proposed by ENTSOG. Preference for document based data exchange.
  
  o Need for flexible implementation timelines

> Stakeholders’ view (GIE - Philipp Palada)

  o Too early to speak about harmonisation when the business processes are not completely defined yet.
  
  o The NC has to describe the process to develop the solution to implement.
  
  o Handbook has to include a solution for each need but every party should be allowed to use another solution. Compatible solutions should also be allowed.
  
  o For some (non-TSO) market participants the cost for a common solution may be too high. Roadmap proposal is supported.

Discussion Data Exchange

> Q (Michael Sostmann): The code for data exchange does not come too early, but too late, as there are already processes requiring data exchange for implementation. The process requirements can be in the proposed Handbook, but the HOW should be identified in the code.

> Q (Filip Sleeuwagen): Rather than a one-shot description of the solution, we should describe an evolving process. Consultation is necessary not only now for the development of the code, but also when updating.
A (G. Van Hauwermeiren): When writing the FG the question had to be answered of what has really to be harmonised in a mandatory way in support of the single energy market. FG focuses on HOW and not on WHAT as the WHAT depends on other business processes. It is clear that the content of the communication (WHAT) will have to change each time the needs change. But, that means that also the relevant codes, containing the other business processes will have to change. From an ACER point of view, flexibility is not seen as the first priority to consider, but the decision is crucial what to harmonise on a mandatory basis, leaving the rest to be taken into account on a voluntary approach, all in function to rule out barriers for trade.

Q (Klaas Beukema): Stakeholders clearly express the need for more flexibility in implementation.

A (G. Van Hauwermeiren): We shouldn’t only see the costs/benefits for TSOs for implementation but see the cost/benefits for the whole market.

Q (Chris Logue): Flexibility is necessary for the industry to keep the existing solution. The solution we will choose today will be based on the needs known so far. The optimum technology solutions will change in the future, whether or not the business processes for the EU Codes change.

Q (Giuliano Basso): With regard to the Cost Benefit Analysis, it is expected that the most important cost is for the content of communication which changes according to the changed business requirements. provided in the NCs. In fact, the change of business requirements could heavily impact on the structure of Data Bases and of messages exchanged between parties. The adoption of a new protocol, to create a layer for transportation of messages, could also have a similar impact, although the cost could be mitigated by a solution based on agents which translate from the old to the new protocol. Nevertheless, for reason of operation stability (and investment) it is recommended to freeze protocol changes for a period of time once it has been implemented.

A (G. Van Hauwermeiren): The description of the protocol is absolutely necessary in the NC. Otherwise, nothing will be mandatory.

Q (Chris Logue): The electricity TSOs are allowed to use a handbook and it works fine. Why not for gas?

A (G. Van Hauwermeiren): Electricity sector is different from gas. The use of the Handbook is under discussion.
4. Units (14:30-15:30)

> Proposed common set of Units (Colin Hamilton ENTSOG/Nat. Grid)

> Stakeholders’ view (EFET – Filip Sleeuwagen)
  
  o Full standardisation of Units is mandatory for a transparent open market to reduce the risk for mistakes.
  
  o If no harmonisation, standard conversion factors are necessary.
  
  o Harmonisation of naming convention is strongly recommended.
  
  o Implementation of what is in the NC is essential. A deep involvement of all stakeholders in that time period and in that process is of key impact.

> Stakeholders’ view (CEN & MARCOGAZ – Daniël Hec)
  
  o Some of the reference conditions and units in CEN standards are different from those being proposed by ENTSOG for the Interoperability Code.
  
  o Wobbe is an essential parameter for safety purposes.
  
  o The use of a common set of units have to fit to the whole gas chain, you can’t extract one part from the other.

Discussion Units

> Q (Hendrik Pollex): How is monitoring to be done for the implementation of common units?

> A (Filip Sleeuwagen): Implementation brings harmonisation: First we should identify the needs and then the common unit become the standard through practice.

> Q (Ina Adler): Practical example; What do we mean when we speak about 50 bar?

> A (Daniel Hec): The reference should be defined if (a) absolute or (g) gauge is meant.

> Q (Dirk Serruys): How can a standard be changed, what is the governance process?
A (Daniel Hec): Technical committee participants are members of the national standardisation bodies. Clear targets and scope have to be defined. Technical Committee has full power to accept or reject a proposal. National regulation has to make reference to a CEN standard (ref. and date). CEN standards are implemented on a voluntary basis.

Q (Klaas Beukema): 10 years ago it was agreed between the stakeholders under the umbrella of EASEE-gas to have kWh as the standard unit for energy. The CBP was introduced and it is too late now to go back again to MJ.

A (Daniel Hec): Too late to restart the discussion. This is not the main priority now. Focus on the different reference conditions for volume and energy. ENTSOG’s proposal is in line with the existing regulation (kWh).

A (ENTSOG): CAM and Transparency Platform make already use of a common set of units as proposed now by ENTSOG and in line with Regulation.

Q (Peter Meeuwis): EASSEE-gas and CEN are doing a pilot study on Wobbe-Index harmonisation within 5 Member States. That work should be taken into consideration.

A (ENTSOG): Do you propose to leave the units out of the scope of the NC?

Q (Peter Meeuwis): Some reference should be made to the CEN work but what is mentioned in the draft document for Units for the time being is ok. Nothing should be left out.

Q (Stephen Rose): Can "other units" which may currently be included in national legislation override common units in the Interoperability Network Code or can they just be used if both TSOs agree to their use instead of common units; can they just be used to supplement common units.

A (ENTSOG): The NC will define a common set of units applicable EU wide for the external communication by TSOs for the NC/Guidelines linked processes. Other units can be used “in addition”.

5. Closing remarks (ENTSOG: P. Panousos) (15:45-16:00)

Mr Panagiotis Panousos thanked once again for the participation. Mr Panousos asked stakeholder’s to give concrete answers to the questions (ref presentation Data Exchange). Any feedback at this stage will be taken into consideration for the first draft of the NC. But, official consultation will be open for 2 months after the publication of the first draft end of Feb 2013.

The refined documents will be presented during SJWS 3. Meanwhile ENTSOG remains open for additional bilateral meetings with interested parties.