

Contact details

Name
First and Last Name: Michel ROMIEU

Organisation
Company/Organisation Name: UPRIGAZ
Job Title: Président

Contact details
Email: uprigaz@uprigaz.com
Tel:+33 (0) 1 47 44 62 22
Mobile:
Address
Street: Immeuble Citicenter – 19 Le Parvis – Bureau 300
Postal Code:92800
City: Puteaux La Défense
Country:France

How would you describe your organisation?

<input checked="" 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)

L'UPRIGAZ souligne la qualité du document « *Ten Year Network development Plan 2015* » élaboré par l'ENTSOG, qui fournit à l'ensemble des parties prenantes une très grande quantité d'informations tant sur la demande que sur l'offre et sur la problématique des infrastructures gazières de l'Union européenne. Les informations contenues dans le rapport devraient pouvoir éclairer la Commission sur les conséquences, en terme d'infrastructures et d'investissements, de scénarios d'approvisionnement répondant aux objectifs de sécurité d'approvisionnement lorsque la place du gaz dans le mix énergétique européen aura été mieux affirmée.

1. Historiquement, la sécurisation des approvisionnements européens s'est faite dans le cadre de contrats de long terme conclus avec les producteurs diversifiés. Cette diversification a été facilitée par la pratique du *net back pricing* qui gommait les impacts du facteur distance sur le coût d'acheminement. Dans ce système, les acheteurs acceptaient de supporter le risque « volume » en s'engageant sur des contrats « *take or pay* », alors que les producteurs assumaient le risque prix en garantissant la compétitivité structurelle du gaz sur les marchés finals.
2. Avec la libéralisation et la création d'un grand marché intérieur du gaz naturel, la couverture des risques volume et prix ne peut être assurée que par le marché, et il est donc essentiel que ce marché offre suffisamment de visibilité tant en termes de volume que de prix. Or, le marché intérieur européen du gaz naturel est encore en voie d'achèvement et de multiples incertitudes pèsent sur la demande européenne du fait notamment de l'importance prise par le charbon dans la génération électrique au détriment du gaz naturel avec pour conséquence une perspective de croissance nulle de la demande. D'autres incertitudes pèsent sur l'offre avec le développement potentiel de gaz non conventionnels en Europe, la croissance de la part du GNL, le déclin des productions domestiques conventionnelles et les facteurs géopolitiques.

On ne s'est pas suffisamment interrogé sur les raisons des échecs successifs du *Nabucco* et du *South Stream*, en particulier sur le fait qu'il est extrêmement difficile de financer un ouvrage de plusieurs milliards d'euros pour acheminer du gaz en provenance de la zone caspienne sans offrir aux investisseurs des garanties d'une utilisation suffisante de leur tuyau ; garanties qui ne peuvent reposer que sur une croissance de la demande européenne en gaz. En effet, si l'on continue d'afficher une stagnation de la demande de gaz en Europe, la seule perspective offerte à de nouveaux producteurs qui contribueraient à la diversification des approvisionnements est la couverture du déclin naturel des champs situés en Europe. Or, cet élément échappe totalement à leur contrôle. On se souviendra à cet égard de la situation des Etats-Unis qui après avoir

construit des terminaux d'importation de GNL ont développé des ressources non conventionnelles annulant tous les projets d'importation de GNL.

3. Dans ce contexte, la Commission aurait dû fournir à l'ENTSOG des scénarios de demande de gaz à moyen et long terme, assortis d'un certain nombre de contraintes sur l'offre. Ces contraintes devraient porter notamment sur la part maximum qu'un fournisseur ne devrait pas dépasser, sur les ressources prioritaires (production domestique, développement du non conventionnel, et sur la diversification géographique des approvisionnements) afin de permettre à l'ENTSOG de construire le plan à 10 ans des infrastructures dans un nombre limité de scénarios structurants. Ce plan devrait permettre de déterminer, dans chacun des scénarios envisagés, les investissements de cœur de réseau à consentir.

Le travail important et de grande qualité produit par l'ENTSOG s'appuie vraisemblablement sur une **modélisation du cœur de réseau** permettant, dans chacun des scénarios d'évaluer les congestions et d'identifier les infrastructures nécessaires et les investissements à consentir. Ces éléments pourraient permettre à la Commission d'arrêter un **scénario de référence** et ainsi de **concentrer les efforts d'investissement sur les seuls projets prioritaires entrant dans le cadre du scénario de référence**. **L'UPRIGAZ souhaiterait que le modèle de réseau élaboré par l'ENTSOG soit davantage explicité dans le document et que l'architecture cible du cœur de réseau européen dans les différents scénarios d'offre et de demande soient également publiés.**

4. Alors que la Commission européenne envisage de réexaminer le règlement de 2010 sur la sécurité d'approvisionnement, l'UPRIGAZ pense qu'il serait utile, en cas de crise d'approvisionnement touchant l'ensemble de l'Europe, que l'ENTSOG mette à la disposition de la Commission et des parties prenantes un outil lui permettant de prendre rapidement les décisions les mieux adaptées portant tant sur l'offre que sur la demande afin de limiter au mieux les conséquences de la crise sur l'approvisionnement des consommateurs européens.

La Commission pourrait s'appuyer sur la modélisation du cœur de réseau européen élaborée par l'ENTSOG pour disposer, en temps réel, des informations nécessaires.

PART A – Feedback on TYNDP 2015

1. Infrastructure Chapter

In which extent this chapter meets your expectations?				
Poorly:		Sufficiently:	X	Perfectly:
Which parts of this chapter you particularly appreciate, if any? We appreciate the analysis of project submission (2.5)				
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion? A global vision of the EU national gas core network will be helpful				

2. Barrier to investment Chapter

In which extent this chapter meets your expectations?				
Poorly:		Sufficiently:		Perfectly: X
Which parts of this chapter you particularly appreciate, if any? Project promoter perspective policies are very appreciate				
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion? 3.4 An evaluation of the specific barriers to investment during the 10 years plan should be asset and ENTSOG should suggest mitigation				

3. Demand Chapter - Analysis of historical demand

In which extent this section meets your expectations?				
Poorly:		Sufficiently:		Perfectly: X
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? None				

4. Demand Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?			
Poorly:		Sufficiently:	
			Perfectly: X
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?			
None			

5. Supply Chapter - Analysis of historical supply

In which extent this section meets your expectations?			
Poorly:		Sufficiently:	
			Perfectly: X
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?			
None			

6. Supply Chapter - Definition of scenarios to be used in the Assessment Chapter

In which extent this section meets your expectations?			
Poorly:		Sufficiently:	
			Perfectly: X
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?			
None			

7. Assessment Chapter

In which extent this chapter meets your expectations?			
Poorly:		Sufficiently:	Perfectly: X
Which parts of this chapter you particularly appreciate, if any? This document takes into consideration the main supply and demand parameters. This document can be considered as a reference analyses as a medium and long term outlook of European gas market			
Which parts of this chapter should be particularly improved in next edition, if any? If yes, do you have any suggestion? None			

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:	Perfectly: X
Which layout elements you particularly appreciate, if any? It is a comprehensive representation of the EU market and supply			
Do you have any specific concerns regarding the layout of the report? If yes, do you have any suggestion? UPRIGAZ would like that series of maps of the EU networks evidencing of new infrastructures and reinforcement of existing ones be presented in the different scenarios. A table summarizing the corresponding investments and their calendar of completion should also be tabled.			

9. Stakeholder engagement process

Do you consider that ENTSOG offered you sufficient opportunity to be involved in TYNDP process?			
Yes:	X	No:	
Have you taken part in any public workshop or Stakeholder Joint Working Session related to TYNDP 2015?			
Yes:	X	No:	

Which part of the process have you particularly appreciated, if any (public workshop, Stakeholder Joint Working Sessions, bilateral meetings, data collection...)?
UPRIGAZ is very satisfied with the consultation process engaged by ENTSG
Do you have any suggestion regarding how ENTSG could improve the engagement process?

10. General comment

What is your overall appreciation of TYNDP 2015?									
Very poor		Poor		Average		Good	X	Very good	
Do you have any additional comment on the extent in which TYNDP 2015 meets your expectations?									
cf our introduction									

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
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

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
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
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
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...)?	
<p>Other (please describe):</p> <p>UPRIGAZ thinks that any significant project of common interest should be reviewed and asset for its intrinsic merit, even at an early stage of survey. The input of ENTSG's model to evaluate the added value of the project on the overall functioning of the EU gas market should be a significant element for the final investment decision.</p>	

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
Do you see other environmental perspectives that could be addressed in TYNDP assessment?	
If yes, what could be a methodology to address them?	

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	<input checked="" type="checkbox"/>	Right balance		Not comprehensiveness enough	
If too complex, which part of the assessment could be removed from the methodology?					
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

What should be the priority direction(s) of improvement for the next edition?

UPRIGAZ would like that ENTSOG's 10 years plan to present, in a limited number of supply/demand scenarios, the 2025 target map of the EU gas network, evidencing the new infrastructures to consent, the corresponding investment program and ranking accordingly the PCI at an EU wide scale.

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?