

No	First and Last name:	Company Name:	Will you be representing an association (if so, please indicate):	Q1: What do you expect to be your organisations' level of involvement during the Tariff NC development (see chapter 8 for further information)?				Q2: In your opinion, does the draft project plan for the development of a Tariff NC contained in this document provide sufficient basis for quality stakeholder involvement given the timelines within which this project must be delivered?			Q3: What do you think of the proposed timeline, including the frequency and number of public meetings? Are any changes needed?			Q4: What do you think of the proposed topics and scheduling for each SJWS? What other topics might be included?			Q5: Do you think it would be a good idea for there to be live streaming of the SJWSs?		
				(a) Prime mover	(b) Active SJWS participant	(c) Consultation Respondent	(d) Observer	Yes, the project plan contains sufficient information	No, the project plan doesn't contain sufficient information	If the response is no, please propose some improvements for consideration.	Yes, I agree with the frequency and number of public meetings	No, I don't agree with the frequency and number of public meetings	If the response is no, please propose some improvements for consideration.	Yes, I agree with the proposed topics and scheduling for each SJWS	No, I don't agree with the proposed topics and scheduling for each SJWS	If the response is no, please propose some improvements for consideration.	Yes, I agree with live streaming the SJWSs	No, I don't think it is necessary to have live streaming of the SJWS	Do you have any other suggestions that might enhance this process?
1	Eric Gilhaus	AGGM Austrian Gas Grid Management AG				x			x			x				x		No	
2	Andrew Pearce	BP Gas Marketing				x			x			x				x			
3	Doug Wood	BP Gas Marketing Ltd				x			x				x	Some additional consideration should be given to the overall Impact Assessment including definitions of measurable benefits expected from the exercise and a post implementation review to verify if all the effort was justified.	x				
4	Helen Stack	Centrica Plc	No			x			x				x	We agree with the topics presented. However, we believe that mitigating measures need to be discussed in detail.	x		Yes, the high standard of live streaming should be maintained. The method for providing comments or questions to the Chair for online viewers could be improved.		
5	Roddy Monroe	Centrica UK Gas Storage Operator's Group Ltd				x			x				x	Sufficient time must be allowed to establish the rules around how NRA should assess the benefits of gas storage to the transmission network	x				
6	MARIA SCHINA	DEPA				x			x				x		x				
7	Michael Schmöltzer	E.ON Gas Storage GmbH						x	x					Regarding tariffication at transmission-storage points the Network Code shall address clear rules on cost reflectivity and avoidance of double payment in E/E-systems by storage users. Storage users have paid an entry fee before entering the relevant transmission network and an exit fee will be paid upon exit therefrom. Cross subsidies between network users should be avoided, which means that the tariffs applicable at storage shall be cost reflective while taking into account the service rendered at the transmission-storage point. Gas storages contribute to system stability, efficient use of the network and efficient level of investments. This was clearly identified in a study of Pöyry of which ACER is aware. Such contribution and the respective saved costs have to take into consideration to avoid cross subsidies between network users storing gas resp. not storing gas.	x				



12	Aygul Avtakhova	EFET (European Federation of Energy Traders)		x		x	<p>Q2: As an Active SJWS participant, EFET expects to be represented at each workstream meeting and to present its views on issues which are of most relevant to its members. Representatives from a number of EFET member companies are also expected to nominate themselves as Prime movers and will use this as a basis use for updating the wider EFET membership on progress in developing the Network Code.</p> <p>Q3: Broadly yes. We trust that ENTSOG will encourage the same level of stakeholder involvement and collaboration in developing the tariff Network Code as they have done with previous Network Codes.</p>	x	<p>Whilst we accept that ENTSOG needs sufficient time to develop proposals and ultimately to agree these through its internal governance process, we are concerned that the timeline may not allow sufficient time at the outset for the discussion and development necessary for a Network Code of this complexity. As a minimum therefore, we think that ENTSOG should include contingency within Phase 2 of the project plan to allow for further stakeholder discussion, such that if it becomes apparent after the first few SJWS's that topics are not able to be covered in the level of detail necessary within the current timeline, further meetings can be accommodated. EFET would much prefer to extend the overall Network Code timeline by a few months if this results in a well-considered and effective Network Code than to stick rigidly to the formal one year timeline specified in the Regulation and end up with a Network Code which is ineffective or which, worst still, introduces inefficiencies where they do not currently exist.</p>	x	<p>The proposed topics do not seem to fully reflect the topic headings as set out in the Framework Guidelines. For example, reserve price, multipliers, storage tariffs and additional charges for dedicated services or infrastructure are not specifically referred to in the SJWS topic list. Whilst these are probably included within a more general description of the topics and clearly cannot be ignored, it would be helpful if ENTSOG could revise, or further break down, the SJWS topic list for each workstream such that it is possible to map these to topic headings listed in the Framework Guidelines. ENTSOG appears to have scheduled most topics for discussion at least twice with a one month interval between them. Presumably this is to further refine its initial proposals in light of initial stakeholder views and we generally support such an approach. However, we believe there are certain topics, namely reserve prices (including multipliers and seasonal factors), payable price and transparency which merit early discussion and which are likely to require more than two SJWS discussions. There are also other topics, such as virtual interconnection points and bundled capacity, which are unlikely to require much discussion and which can be wrapped up in a single SJWS towards the end of the process.</p>	x	<p>Yes. The quality and interactive capability of the live streaming used by ENTSOG for previous Network Codes has been much appreciated by EFET members and should be continued. In our view it may help to enhance Phase 2 of the development process by scheduling an interactive session within an SJWS to explore the interaction between reserve price multipliers, seasonal factors and payable price and how these influence booking behaviour and revenue recovery. This could be along similar line to the interactive sessions held during the CAM Network Code development process, on auction algorithms and revenue equivalence. Running through further worked example (albeit simplified) of each of the six cost allocation methodologies could also help to provide a more complete stakeholder understanding of this complex issue, which is something previous verbal presentations and written examples have still not succeeded in doing.</p>	
13	Edoardo Settimio	ENEL SPA		x										
14	Hein-Bert Schurink	Energie-Nederland	Yes		x								x	
15	Simone Rossi	Eni		x		x		x		x	<p>The proposed topics and scheduling for each SJWS seem to be appropriate. However, we believe that specific attention should be given to discussions on the mitigating measures to be applied when implementing the new rules</p>	x		
16	Gunnar Steck	E.ON		x		x		x	<p>The proposed timeline is challenging. It would be good to shift time from the internal ENTSOG decision making to the SJWS.</p>	x	<p>We would encourage ENTSOG to particularly dedicate time and focus to the question of how price rises - not only those due to the implementation of the NC - in longer term capacity contracts can be mitigated.</p>	x	<p>Live streaming certainly facilitates participation in the network code development process. We support it. Also, the BAL NC has proven that it is essential to publish written text of draft NC provisions ('business rules') before the relevant workshops as this enables stakeholders much better to reflect on the different topics.</p>	

17	Sébastien Doligé	Eurelectric	Eurelectric			x		x	Yes we believe the project plan provides a reasonably good basis for a quality stakeholder involvement.	x	Generally speaking, we are quite satisfied with ENTSOG transparency, inclusiveness and organisation of the network code process. This said, we would like to underline the importance of giving stakeholders enough time to respond to written consultations; this is really necessary for associations with a large membership. Workshops and meetings are as important as written answers.	x	We believe the list of proposed topics is fine. We would like to ask ENTSOG to publish well in advance on its website the preparatory documents that need to be read before the workshops take place.	x	The use of webinars would be welcomed.
18	MARGOT LOUDON	EUROGAS	YES		x			x		x	It is a very demanding programme but Eurogas will aim to attend all the SJWS meetings.	x	Eurogas would like to see mitigating measures specified as a discussion item.	x	There are arguments for and against. It will offer a low-cost means of participation, free of travel hassle, convenient for company representatives. On the other hand, you may increasingly find that the SJWS are dominated by Brussels-based representatives, and face to face discussions with a wider range of stakeholders is reduced.
19	Kees Bouwens	ExxonMobil	OGP	x				x		x		x		x	
20	Philipp Palada	Gas Infrastructure Europe	Gas Infrastructure Europe	x				x		x		x		x	
21	Nicole Otterberg	Gas Storage Europe (GSE)	Gas Storage Europe (GSE)			x		x		x		x	No, the treatment of storage IPs requires further clarification and should be discussed under cost allocation. With regards to storage the Network Code shall consider clear rules on cost reflectivity and avoidance of double payment in E/E-systems by storage users. Storage users have paid an entry fee before entering the relevant transmission network and an exit fee will be paid upon exit therefrom. Cross subsidies between network users should be avoided, which means that the tariffs applicable at storage IPs shall be cost reflective while taking into account the service rendered at the storage-transmission point. Gas storages contribute to system stability, efficient use of the network and efficient level of investments.	x	
22	Ivelina Boneva	GasTerra B.V.	No		x			x		x	GasTerra acknowledges ENTSOG's obligation to deliver the TAR NC within the indicated period. However we find this a very ambitious timeline. Therefore, GasTerra deems it wise to re-evaluate the overall deadline of 31 December 2014, between the 2nd and 3rd phase of network code development, in light of the ongoing discussion and quality of the Network code that should be delivered.	x	GasTerra would like to see the issues related to incremental capacity (the economic test, tariff issues related to incremental capacity and relevant information provisions) will not only be addressed in the NC CAM adaptation process. We think it is important to also discuss these issues during the SJWS on TAR in order to ensure consistency. Furthermore, GasTerra would like to see the issue of mitigating measures and/or predictable tariff development to be included in the Project Plan.	x	Yes, GasTerra thinks it is a good idea to have live streaming of the SJWS as this will further support stakeholder engagement. However, ENTSOG might consider requiring parties to register for the streaming sessions as well as for the workshops. This will allow ENTSOG to evaluate the relevance of participating stakeholders.

23	Francisco Goncalves	Gazprom Marketing & Trading			x		x			x			x		free access to all no registration required
24	Alex Barnes	Gazprom Marketing & Trading		x			x			x			x		yes, access without registration please
25	Jean-Louis MARTIN AUD	GDF SUEZ	No	x			x				x		x		GDF SUEZ believes that 3 more issues must be addressed in specific SJWS : => mitigating measures in case of tariffs change, => tariffs multipliers in case of short term capacity reservations, => the case of storages and entry/exit fees at these points due to the fact that storages participate to transmission networks economy and security of supply.
26	Sylvie Denoble Mayer	GDF SUEZ Infrastructures			x		x				x		x		The treatment of storages is not mentioned in any of the SJWS of the draft project plan. We need to have a specific session on this subject, because the FG are too vague (the wording on the draft version dated 18 July 2013 was better). The NC has to outline the following points: 1. Storage users have paid an entry fee when entering the relevant transmission network and will pay an exit fee when exiting it 2. The NC should require that NRAs should take due account of the benefits that the respective national gas market derives from gas storage (contribution of gas storages to system stability, efficient use of the network and efficient level of investments) 3. Setting too high tariffs at storage IPs would reduce the level of storage bookings; this would, as a consequence, have a negative impact on security of supply.
27	Alexander Kronimus	German Chemical Industry Association	Cefic		x		x			x			x		
28	Zsolt Éles	Hungarian Gas Storage Ltd.			x		x				x		x		We would like to propose that the TAR NC developing project discuss on storage IPs too. We believe the following aspects should be considered at transmission-storage points: Security of supply is a crucial aspect in Hungary because of the single import gas source (80% import dependency in Hungary). The high tariffs at storage IPs causes less storage bookings and security of supply was declined. Gas storages contribute to system stability. Hungarian storages have very important role in daily gas balancing. Such contribution and the respective saved costs have to take into consideration to avoid cross subsidies between network users storing gas and not storing gas. Storage users have paid an entry fee before entering the relevant transmission network and an exit fee will be paid upon exit there from. Cross subsidies between network users should be avoided, which means that the tariffs applicable at storage shall be cost reflective. These 3 aspects are of equal importance for the integration of the European gas market as cross border trade.

29	Marc Malbranc	INTER-REGIES	CEDEC		x		x	Yes, but ... given the proposed timeline (see point 4) quality stakeholder involvement will be a challenge.	x	The frequency of two SJWS per month seems very ambitious from experience with the development of other network codes. In our opinion two weeks between sessions does not give ETSOG sufficient time to adapt/develop/... the draft, nor does it allow for stakeholders to prepare qualitative input (no time for feedback within organizations,...). Furthermore, the planning does not provide for handling topics that were not discussed or treated in the dedicated session. The global interaction period (not even three months) with stakeholders at the beginning of the development of the NC is too short and should be extended (doubled) by shortening phase 3.	x	Topics seem OK, but timing is wrong (see above point 4).	x		
30	Lajos Butosi	Magyar Gáz Tranzit Zrt.			x		x		x	In order to be able to increase the frequencies and the quality of interactions, propose more virtual meetings which could increase the activity of interactions.	x	In the process NRAs involvement is inevitable.	x	support.	
31	Natalia Romero Seijo	Reganosa		x			x	Reganosa has been studying for one year the different methodologies on the cost allocation with the University of Santiago de Compostela. We have developed software named GANESO (Gas Network Simulation and Optimization) that simulates and optimizes the flows on a gas network and provides tariffs obtained by the different methodologies studied for that network snapshot. On GANESO, we have implemented all the methodologies and we could choose the different entry/exit split as 50:50 split, different backhaul and different parameters to the secondary adjustment. Reganosa and University of Santiago de Compostela have published an article on Energy Policy where this topic is developed: <a href="http://www.sciencedirect.com/science/article/pii/S0301421513008999">http://www.sciencedirect.com/science/article/pii/S0301421513008999</a> Also, we already prove that the capacity-weighted distance approach and matrix approach provide the same tariffs as a result and we are waiting to publish the second article where we evidence it on a mathematical form.	x		x	Reganosa wants to propose to ETSOG a bilateral meeting to participate actively on this transparent development of the tariffs network code and to show you our software and the different simulations that we could do, as well as to share the conclusions that we have obtained after the last year studying the different cost allocation methodologies. As well, we propose the following topics for discussion at each SJWS: •SJWS 1 (11 Feb): Cost Allocation and determination of reference price (with focus in cost allocation methodologies by country and secondary adjustments), Capacity and commodity Split, Bundled Capacity, Interruptible Capacity & Non-physical backhaul, •SJWS 2 (27 Feb): Virtual Interconnection Points (VIPs), Payable Price, Revenue Recovery, Tariff Setting Year Impact Assessment (IA), Seasonal Factor. •SJWS 3 (14 Mar): VIPs, Transparency, Cost Allocation, Seasonal Factors, Incremental and new capacity and its relation with the selected methodology and secondary adjustment •SJWS 4 (26 Mar): Cost Allocation, Tariff Setting Year IA, Interruptible Capacity & Non-physical backhaul, Revenue Recovery, Additional topics •SJWS 5 (9 Apr): Additional topics and conclusions.	x		

32	Daniel Urban	RWE Gas Storage			x		x			x			x	RWE Gas Storage believes that the topic of tariffs at gas storage e/e points should be given sufficient attention at one of the workshops. We believe that the following specific aspects should be taken into consideration: 1) The fact that users of the transmission network have paid for the use of the network when they entered it and may also pay upon exiting it. The entry to and exit from storages should be therefore significantly reduced or removed altogether. 2) The fact that storage facilities greatly contribute to the stability and efficiency of the grid. These benefits are also shared by those network users who have not booked storage capacity. 3) The fact that storage facilities greatly contribute to security of supply in Europe.	x
33	Stephen Rose	RWE Supply & Tarding GmbH	No but I participate in Eurelectric and EFET and will be keeping them apprised of developments	x											
34	Davide Rubini	Statoil OGP		x			x			x			x		
35	Marta Kamola-Martines	Storengy				x				x			x	As regards section 3.4 (storage) of the final version of the Framework Guidelines, we note that the text has changed as compared to the previous draft version which enjoyed widespread support from stakeholders. As a matter of fact the final text disregards some important aspects that were initially listed as necessary to consider when setting or approving E/E tariffs from and to storage. However, we would like to stress that the items mentioned by the FG should not be treated as an exhaustive list – in fact, the current text is not drafted in that sense. In this context, we would like to reiterate once again the aspects which have been voiced previously by both Storengy and GSE and which should be taken into account by ENSTOG when drafting the Tariff Network Code : <ul style="list-style-type: none"> <li>• Storage users have paid an entry fee before entering the relevant transmission network and will pay an exit fee.</li> <li>• Storage contributes to system efficiency and optimization, notably in terms of the avoided investment and reduced operating costs of the transmission network. Cross-subsidies between storage users and shippers who do not use storage should be avoided.</li> <li>• The tariffs applicable at storage points shall be cost reflective while taking into account the service rendered.</li> <li>• Storage contributes to security of supply and system stability.</li> </ul>	x

36	Robert Jan Maaskant	TAAQ	Gas Storage Netherlands		x			x					x	Gas Storage Netherlands has expressed its concerns on the vague wording in the framework guidelines in a letter to ACER (and also shared this letter with the European Commission and ENTSOG) of 11 December 2013 . We trust ENTSOG will address the problems identified in the draft ACER impact assessment of September 2012 with regard to the wide variety of treatment of transmission tariffs for gas storage users in Member States, hampering a level playing field and efficient investment. Other problems that were mentioned are the fact that (1) in some entry- and exit systems gas storage users essentially pay entry- and exit tariffs twice and (2) in some Member States benefits of gas storages for the transmission network into account when setting transmission tariffs (such as stabilising the system and contributing to utilisation and investment optimisation by the TSO) are not taken into account . Gas Storage Netherlands would appreciate the point on specific transmission tariffs for gas storages to be added to the agenda for the SJWS (for instance under cost allocation issues) and we trust the network code will contain a meaningful text on specific transmission tariffs for gas storages that will properly address the lack of harmonisation of treatment of specific transmission tariffs for gas storages. A copy of the letter of 11 December 2013 will be sent by email to Ann-Marie Colbert and Jan Ingwersen.	x		
37	Dirk-Jan Meuzelaar	Utility Support Group	IFIEC/Cefic	x				x					x				
38	Helga Norrby	Vattenfall			x												
39	Bryan Hennessy	Vayu Limited	No			x		x					x	I think there should be a brief session on the calculation of allowed revenue. The methodology used by RA's varies significantly. A consistent methodology would be beneficial.	x		
40	Valentin Höhn	VIK Germany	IFIEC Europe		x			x					x				