



**DSO-Comments to the paper to define
the scope of the Framework Guideline on Interoperability Rules
for the European Gas Transmission Network**

- **Annex to the Scoping Document (Questionnaire), 23 August 2011 -**

2.Q - Definitions

2.Q1 - Considering the proposed definition, the Framework Guidelines on Interoperability Rules (FGI) should be focussing on the cooperation of network operators.

2.Q2 - The cooperation should expressly relate to the operational/technical areas between network operators. Further access relevant processes such as capacity allocation, congestion management or balancing should be regulated by the specific Framework Guidelines.

Important exits, as LNG, storage and biomethane injection could be part of FG Interoperability, if relevant for the technical operation of the networks, e.g. gas quality.

The Framework Guidelines should in general terms not be applied between network operators and shippers or network operators and end consumers as these are subordinated to special regulation.

2.Q3 – A wider scope of definition (interoperability of electricity and gas networks) is not need yet. The injection of synthetic gas or hydrogen has to fulfil general terms and condition for the operation of the gas networks. Special market instruments or a market design or other support mechanism have to be clarified in the relevant guidelines or by national rules.

2.Q4 – See also 2.Q2. The cooperation of network operators is not possible without involving and considering the DSO level. Almost all of the proposed areas of application especially gas quality, capacity allocation, data exchange, unit harmonisation, interconnection agreements will have a direct or indirect influence on the cooperation/settlement between TSOs and DSOs. We see a direct influence regarding the injection of biomethane in the local networks (especially in Germany with a “feed up” from distribution to transmission networks in the summer period.

Thus, it is imperative that the DSOs are taken into consideration at the relevant points. If the FGI also encompasses rules on the network interconnection between the TSOs and DSOs, one solution could be that these rules are not written out as binding network codes but are regarded as non-binding “good practice” rules.

However, it will then be required to include, in particular, the DSOs in the drafting of the Framework Guidelines on Interoperability and of the network codes.

GEODE offers its cooperation to ACER and ENTSOG and is willing to play an active role in the drafting process of Framework Guidelines on Interoperability and the corresponding network codes.



3.Q - on application

For 3.Q1 and 3.Q2 see 2.Q2 and 2.Q4.

3.Q3 – With a relation only on operational/technical areas (see 2.Q2) a detailed fine-tune is not necessary.

4.1Q - Nomination and Matching Process

4.1.Q1 and 4.1.Q2 - Harmonisation rules on nomination and matching in the FGI are very sensible but they are not a DSO-related topic.

A coordination or even harmonisation with the electricity processes appears to be very useful. Such cross-sector harmonisation should at least be included in the questionnaire.

4.1.1.Q – Gas Day

We would welcome a standard definition of the gas day.

4.1.2.Q – Nomination Scheme

See 4.1Q.

4.1.3.Q – operational constraints

4.1.3Q6 – no comments.

4.1.3Q7 – Should be part of the special SoS-FG.

In general: Physical difficulties of delivery (constraints): in this respect it should at least be clarified that the DSOs are not affected. Since security of supply for final consumers has priority in the distribution system, an exception would be reasonable in this context; otherwise there is the risk of conflicts of interest (if capacity is to be increased at transmission level). If cooperation with the DSOs is ensured then this should be sufficient.



4.2.Q1. - Interconnection Agreement

4.2.Q1 – no comments.

4.2.Q2 - Defining issues to be regulated by interconnection agreements is basically reasonable. The content of these issues should also be outlined in order to give ENTSOG a clear work assignment.

4.2.Q3 - Furthermore, it is important to clarify that only technical aspects of interconnection points (such as measurement, data exchange etc) are addressed and that there will be no mix with capacity bookings, allocation or nomination requirements.

The FGI or the network code by ENTSOG should serve as recommendation or as a model for the interconnection agreement between the TSO and DSO. For this, however, the DSOs must be involved in the discussion process. In case of a model interconnection agreement TSO-DSO, it must be clarified that only the physical aspects are important and that capacity bookings or balancing aspects (matching, allocation) are without significance.

4.3.Q - Units Harmonization

4.3.Q1 – no comments.

4.3.Q2 - Including such rule in the FGI would be very sensible. This issue concerns all network operators not only the TSOs. In principle, a harmonisation with the electricity sector should take place. This should not apply only to the units but also and especially to other terms/functions.

4.4.Q - Gas quality

4.4.Q1 – no comments.

4.4.Q2 - With a view to the change of gas flows/gas qualities, the issue of gas quality harmonisation and thus the handling of the necessary change from one gas quality to the other is important. The current question in Germany e.g. is the change from L-Gas to H-Gas: Who is going to decide this? Who is going to bear the costs?

Due to the effects on final customers, changing the gas quality affects the DSOs to a much greater extent than the TSOs. DSOs have to be invited in drafting the papers. See also 2.Q.

4.5.Q - Data exchange



4.5.Q2 - The principles of simplification and proportionality (e.g. reduction of message formats) must be urgently clarified and in relation to new requirements/supplements the implementation costs should be taken into account.

In this context it is necessary to have a clear change management with a say and sufficient transition periods.

Also in this matter it is to be expected (and it is reasonable) that the same provisions apply to the DSOs. Consideration of the DSO level strongly required!

4.5.Q3 - The question should be posed as to what extent a harmonisation with the data exchange processes and data formats of the electricity sector is possible. The EDIFACT standard could apply to both sectors.

4.6.Q - Capacity calculation

4.6.Q.1 – no comments.

4.6.Q.2 - FG CAM and the ENTSOG draft of the network code does not contain a rule as to how the TSOs' capacities shall actually be calculated. As long as the focus is put on data and information exchange, consultation processes and problem solutions in case of coordination difficulties, it is basically sensible to include in the FGI a rule on the method for calculating the TSO's capacities.

For reasons of security of supply for final consumers, it must be expressly clarified that the DSO's capacity requirements are given priority when calculating the capacities of the TSOs. The DSO is not a normal shipper towards the TSO. DSOs are part of the network system! To promote the interoperability of the entire system and limit DSO's peak loads, positive incentives for active network control and cooperation could be created for the DSOs.

4.7.Q. Supplementary issues (no. 2.3.7)

4.7.Q.1 - Data measurement at the interconnection point: minimum standards and clarification of the question whether (cost-intensive) additional control /measurement devices are needed;

Increasing decentralised feed-in of biomethane and the issue of feed-out at higher pressure levels (e.g. DSO to TSO) and deodorization requirements; Technical standards concerning the hydrogen feed-in and the conversion of wind power to gas.

4.7.Q.2 and 4.7.Q.2 – See the comments above.

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