



## **Public Consultation on Draft Framework Guidelines on Interoperability Rules and Data Exchange for the European Gas Transmission Networks**

**– Answers to the Questionnaire –**

### **1. Scope and application, implementation (Chapter 1 of the Framework Guidelines (the 'FG'))**

**1.1.** Do you consider that the FG on interoperability and data exchange rules should harmonise these rules at EU level, as follows:

- a) At interconnection points only?
- b) Including interconnection points and where appropriate points connecting TSOs' systems to the ones of DSOs, SSOs and LSOs (to the extent cross-border trade is involved or market integration is at stake)?

#### **GEODE:**

**The scope of the FGI or the network code by ENTSOG should take into account that a harmonisation of TSO-systems regarding interoperability and data exchange will have deep impacts on DSOs, SSOs and LSOs, especially on data exchange, gas quality, odorization and capacity calculation.**

**The FG should focus on a harmonisation of interconnection points, but should stress the needs and should ensure the cooperation between TSOs and the connecting parties mentioned above.**

**See also 2.).**

- c) Other option? Please explain in detail and reason.
- d) I don't know.

**1.2.** Do you consider that for any of the above options the level of harmonisation<sup>1</sup> shall be (Section 1.b of the FG):

- a. Full harmonisation: the same measure applies across the EU borders, defined in the network code?
- b. Harmonisation with built-in contingency: same principles/criteria are set with a possibility to deviate under justified circumstances?
- c. No additional harmonisation, meaning rules are set at national level, if they deemed necessary by the national authorities, which may include either NRAs or the government?



1.3. Shall any of the issues raised in the FG (Interconnection Agreement, Harmonisation of units, Gas Quality, Odourisation, Data exchange, Capacity calculation) get a different scope from the general scope as proposed in section 1.b. of the FG (and as addressed in the previous question)? Please answer by filling in the following table, ticking the box corresponding to the relevant foreseen scope.

**GEODE: 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.**

**Thus, it is imperative that DSOs (and the cooperation with and the involvement of them) are taken into consideration at the relevant points. If the FGI also encompasses rules on the network interconnection between the TSOs and DSOs (what we do not recommend), 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.**

**Considering the direct or indirect effects of the FGI’s provisions on DSOs, the FGI shall include the following provision, which is already part of the Framework Guidelines on Gas Balancing in Transmission Systems:**

**“ENTSOG shall involve DSOs in the drafting of relevant sections of the network code, adopting an efficient process of engagement through organisations representing DSOs at a European or, where appropriate, national level.”**

**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.**

1.4. What additional measures could you envisage to improve the implementation of the network code? Please reason your answer.

## **2. Interconnection Agreements**

2.1. Do you think that a common template and a standard Interconnection Agreement will efficiently solve the interoperability problems regarding Interconnection Agreements and/or improve their development and implementation?

a. Yes.

b. No.

c. I don't know.

d. Would you propose additional measures as to those proposed? Please reason your answer.

e. Would you propose different measures as to those proposed? Please reason your answer.



## **GEODE:**

**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.**

**2.2.** Do you think that a dispute settlement procedure as laid down in the text will efficiently contribute to solving the interoperability problems of network users regarding Interconnection Agreements and their content?

- a. Yes.
- b. No.
- c. I don't know.
- d. Would you propose additional measures as to those proposed? Please reason your answer.
- e. Would you propose different measures as to those proposed? Please reason your answer.

**2.3.** Do you think that a stronger NRA involvement in the approval of the Interconnection Agreements could be beneficial? Please explain in detail and reason.

- a. Yes.
- b. No.
- c. I don't know.

## **3. Harmonisation of Units**

**3.1.** Do you think that there is a need for harmonisation of units?

- a. Yes.
- b. No, conversion is sufficient in all cases.
- c. I don't know.
- d. Would you propose additional measures as to those proposed? Please reason your answer.
- e. Would you propose different measures as to those proposed? Please reason your answer.

**3.2.** What is the value added of harmonising units for energy, pressure, volume and gross calorific value?

- a. Easier technical communication among TSOs.
- b. Easier commercial communication between TSOs and network users.
- c. Both.
- d. No value added.
- e. I don't know.
- f. Other views. Please reason your answer.

**3.3.** Shall harmonisation be extended to other units? Please reason your answer.



#### **4. Gas Quality**

4.1. Please provide your assessment on the present proposal; in particular assess the provisions on ENTSOG gas quality monitoring, dispute settlement and TSO cooperation. Would these measures address sufficiently the issues that are at stake? Please reason your answer.

**GEODE: 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.**

4.2. Do you consider that a technically viable solution to gas quality issues that is financially reasonable will most likely result from:

- a. Bilateral solution between concerned stakeholders.
- b. Solutions to be developed cross-border by TSOs, to be approved by NRAs and cost-sharing mechanism to be established.
- c. The establishment of a general measure in the Framework Guidelines, setting a comprehensive list of technical solutions to select from.
- d. I don't know.
- e. Other option. Please reason your answer.

#### **5. Odourisation**

5.1. Please provide your assessment on the present proposal. Would the measure proposed address sufficiently the issues that are at stake? Please reason your answer.

**GEODE:**

**see under 4.1. Odourisation issues are related to DSO-business and very important for DSOs. DSOs have to be invited for drafting the papers.**

#### **6. Data exchange**

6.1. Please provide your assessment on the present proposal. Would the measures proposed address sufficiently the issues that are at stake? Please reason your answer.

**GEODE:**

**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!**

**The Draft FGI states that the selection of the format concerning data exchange by ENTSOG shall be based on a cost-benefit analysis subject to consultation with industry. In the light of the above-mentioned role of the DSOs, the FGI shall expressly mention the DSOs as a consultation party.**

6.2. Regarding the content of this chapter,

- a. Data exchange shall be limited to the communication format.



b. Data exchange shall define both format and content, at least regarding the following points: \_\_\_\_\_ . Please reason your answer.

c. I don't know.

d. Other option. Please reason your answer.

**6.3.** ENTSOG may support the exchange of data with a handbook of voluntary rules. Please share your views about such a solution.

## **7. Capacity calculation**

The Agency view is that discrepancy between the maximum capacities on either side of an interconnection point, as well as any unused potential to maximise capacity offered may cause barriers to trade.

**7.1.** Please provide your assessment on the present proposal. Would the measures proposed address the issues that are at stake?

### **GEODE:**

**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.**

**7.2.** Would you propose additional measures as to those proposed? Please reason your answer.

**GEODE: 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 control and cooperation could be created for the DSOs.**

**7.3.** Would you propose different measures as to those proposed? Please reason your answer.

## **8. Cross-border cooperation**

**8.1.** Please provide your assessment on the present proposal.

**8.2.** Do you have any other suggestions concerning cross-border cooperation? Please reason your answer.

**9. Please share below any further comments concerning the Framework Guideline on Interoperability and Data Exchange Rules.**



**GEODE:**

**Data measurement at the interconnection point shall be mentioned: minimum standards and clarification of the question whether (cost-intensive) additional control / measurement devices are needed.**

**Christian Thole**