

16 March 2012

**PC-07- PUBLIC CONSULTATION ON DRAFT FRAMEWORK GUIDELINES
ON INTEROPERABILITY RULES AND DATA EXCHANGE FOR THE EUROPEAN GAS
TRANSMISSION NETWORKS**

QUESTIONNAIRE

Please provide the Agency with your full contact details, allowing us to revert to you with specific questions concerning your answers.

Name:

Position held:

Phone number and e-mail:

Name and address of the company you represent:

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)?
- 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 harmonisation¹ shall be (Section 1.b of the FG):

- a. Full harmonisation: the same measure applies across the EU borders, defined in the network code?

¹ Harmonisation is used in the meaning of replacing two or more legal systems with one single system.

- 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.

	IAs	Units	Gas Quality	Odourisation	Data Exchange	Capacity Calculation
Full harmonization						
Partial harmonization						
Business as usual						

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.

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.
- 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.

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

Thank you very much for your contribution.

Agency for the Cooperation of Energy Regulators