

## (refined) Draft Network Code on Balancing – stakeholder support process

### SSP Response Sheet

Please complete the fields below and send via email using the subject title, “Response to the BAL NC SSP” to [info@entsog.eu](mailto:info@entsog.eu) by 28 September 2012.

#### Name

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#### Organisation

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European Countries in which your organisation operates: Austria, Belgium, France, Germany, Greece, Hungary, Italy, Luxembourg, Portugal, Slovenia, Spain, The Netherlands, UK.

How would you describe your organisation?

<input type="checkbox"/>	Association	
<input checked="" type="checkbox"/>	End user	
<input checked="" type="checkbox"/>	Network user	
<input checked="" type="checkbox"/>	Trader	
<input checked="" type="checkbox"/>	Other	Producer

Question 1: Do you consider that the network code development process carried out by ENTSG was appropriate, given the boundaries of the framework guideline? In particular, was the level of stakeholder engagement appropriate? If there is room for improvement, please inform us about possible suggestions for improvement.

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Comments: Eni expresses appreciation for the very high standard work of ENTSG. The process was conducted in a very professional way, with a high level of transparency and stakeholders' engagement.	

Question 2: Please complete the table below, indicating whether you support the relevant sections of the Draft Network Code on Balancing, having regard to the process carried out and ENTSG's aim to reflect the views of the majority of users during the development process.

Chapter	I: General Provisions	II: Balancing System	III: Cross-border Cooperation	IV: Operational Balancing
Support	X	X	X	X
Do not support				

Chapter	V: Nominations	VI: Daily Imbalance Charge	VII: Within-day Obligations	VIII: Neutrality Arrangements
Support	X	X	X	X
Do not support				

Chapter	IX: Linepack Flexibility Service	X: Information Provision	XI: Implementation, Interim Steps
Support	X	X	X
Do not support			

Please provide brief reasoning for your responses, if you wish.

Eni generally supports the Draft Network Code.

On Operational balancing art. 13.3, however, the Code should provide for TSOs to be allowed to trade in adjacent markets only on exceptional basis for security reasons. It should be up to market players to bring flexibility when there are incentives to do so. Otherwise, TSOs trading activity would reduce price signals and possibly create market distortions because of information asymmetry.

Question 3: Do you believe that the eventual implementation of the refined draft Network Code will enhance the functioning of the internal gas market?

Yes X	No
Comments: The implementation of the refined draft Network Code will contribute to the delivery of a liquid wholesale market, which was the policy goal behind the new Balancing Target Model. Good management of transition and continuous monitoring of the correct functioning of the new regulatory framework would be necessary.	