

(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 by 28 September 2012.

Name (Confidential)

Organisation

Company/Organisation Name: EnBW Energie Baden-Württemberg AG

How would you describe your organisation?

<input type="checkbox"/>	Association	(please specify type)
<input type="checkbox"/>	End user	
<input type="checkbox"/>	Network user	
<input type="checkbox"/>	Trader	
<input checked="" type="checkbox"/>	Other	EnBW Energie Baden-Württemberg AG is one of the four major energy corporations in Germany with companies participating in all parts of the gas and electricity value chain.

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

Comments:

We consider the development process of the Network Code as an excellent example of how to set up a real stakeholder involvement

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
Do not support			X	

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

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

In regards to the Chapter on Within-Day-Obligations we feel that the NC could have been more ambitious. Just stating that *Network Users (must) have access to adequate information in a timely manner regarding their inputs and/or Off-takes and have reasonable means to respond to manage their exposure* does not add much value to the requirements of the framework guidelines, as the FG already clearly state that sufficient information must be provided to network users to enable them to comply with the obligation. We would have preferred if the NC had specified more clearly what is meant by e.g. timely manner and reasonable means and had outlined the framework of how e.g. hourly obligations can be or have to be set up.

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

Comments:

In many ways we are satisfied with the outcome of the Network Code and think that it will help to enhance a functioning internal gas market. Nevertheless, for the near term future it seems unlikely that the NC will result in one European wide Balancing System as various of the existing regimes (UK, Belgium, Germany) fit quite well under the umbrella of the NC.