

## **(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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Countries in which your organisation operates: The Netherlands, The UK

How would you describe your organisation?

<input type="checkbox"/>	Association	(please specify type)
<input type="checkbox"/>	End user	
<input checked="" type="checkbox"/>	Network user	
<input type="checkbox"/>	Trader	
<input type="checkbox"/>	Other	(please specify)

Question 1: Do you consider that the network code development process carried out by ENTSOG 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 <b>X</b>	No
Comments: The network code development process carried out by ENTSOG has been appropriate and constructive and has resulted in a well balanced network code. GasTerra very much appreciates the high level of 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 ENTSOG'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 With the exception of Article 36 para 2 (please, refer to the remarks below)
Do not support				

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

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

Article 36 para 2 provides for an apportionment of Balancing Neutrality Charges to a Network User related to the extent this Network User makes use of the relevant Entry and/or Exit Point(s) concerned or the transmission network under the related methodology. GasTerra believes that the apportionment scheme shall be a function of imbalance performances of each individual Network User. That would lead to a better allocation of costs and revenues than an apportionment scheme based on capacity holdings or actual Inputs and Off- takes of each individual Network User.

Chapter IX provides for a possibility for the TSO to offer a Linepack Flexibility Service to the market. GasTerra opposes to the selling of linepack not needed for maintaining system integrity. This linepack should be allocated in a non-discriminatory way to all network users, and should be provided free of charge.

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: GasTerra firmly supports the efforts to enhance the functioning of the internal market and believes that this Network Codes is another step in this direction.

