

(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

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Countries in which your organisation operates: DE, NL, UK, BE; DK; FR, AT, CZ

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 checked="" 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Comments:	

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	
Do not support				X

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.

WINGAS generally supports the balancing regime which is proposed by ENTSG.

In Article 36 (5) a separate Balancing Neutrality Charge is prescribed. WINGAS does not see a necessity for such an obligation. The necessity of a separate Balancing Neutrality Charge should be decided on a national level according to the detail configuration of the national balancing system. Therefore the wording should be changed from **shall provide** to **could provide**.

The impact of a separate Balancing Neutrality Charge on different balancing regimes in Europe cannot be foreseen right now. The implementation of such an obligation is very difficult and can change the whole incentive system within a balancing system. Therefore such a separate Balancing Neutrality Charge should be discussed with the NRA and should be consulted with stakeholders.

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:	