

## (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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How would you describe your organisation?

<input checked="" type="checkbox"/>	Association	(please specify type)
<input type="checkbox"/>	End user	
<input 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 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
<p>Comments:</p> <p>The NC development process chosen by ENTSG showed that it is possible to integrate a whole range of stakeholders in achieving a complex aim: developing pan-European binding rules. The proactive approach ENTSG took should be an example to likewise processes on a national level and encourage TSOs to implement transparent and open ways to develop framework rules in such a way: all relevant documents were publicly available, the status of the process was always clear, ENTSG was open for contact and input at any time, workshops could be followed by livestreams, the documentation of workshops was transparent. Every stakeholder could participate at any time and ENTSG listened to majority as well as minority opinions. Listening to all stakeholders is crucial to balance the strong influence prime movers have on the NC.</p>	

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
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<b>Support</b>	<b>x</b>	<b>x</b>	<b>x</b>	<b>x</b>
<b>Do not support</b>				

<b>Chapter</b>	V: Nominations	VI: Daily Imbalance Charge	VII: Within-day Obligations	VIII: Neutrality Arrangements
<b>Support</b>	<b>x</b>	<b>x</b>	<b>x</b>	
<b>Do not support</b>				<b>x</b>

<b>Chapter</b>	IX: Linepack Flexibility Service	X: Information Provision	XI: Implementation, Interim Steps
<b>Support</b>	<b>x</b>	<b>x</b>	<b>x</b>
<b>Do not support</b>			

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

#### Chapter VIII:

BDEW agrees with the majority of refinements in this chapter. However BDEW has concerns over Article 36 (5), in which “...the TSOs methodology for Balancing Neutrality Charges shall provide rules for a separate Balancing Neutrality Charge in respect of Non Daily Metered Off-takes”.

BDEW does not see a necessity for such an obligation. Therefore BDEW propose to change the wording from ***shall provide*** to ***could provide***.

The basic principles of the Neutrality Charge should be defined on a national level. Therefore such a separate Balancing Neutrality Charge should be discussed with the NRA and should be consulted with stakeholders.

The cross-subsidies that are matter of concern in Variant 2 are as well existent in a system with separated Neutrality charges for NDM –offtakes and DM – offtakes.

#### Chapter XI:

BDEW wants to emphasize, that existing contractual rights must remain unaffected. I.e. regarding Article 49 iii), number 8 – the targets set by the regulatory authority must always regard to the contractual conditions referred to in paragraph 3 of the same article.

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 ☒

No

Comments:

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