

**GTE+ 2010 AWP Consultation Initial Proposals**

**Feedback Proforma**

Please use the attached template for Stakeholder feedback to the “GTE+’s 2010 Annual Work Programme Consultation – Initial thoughts” document.

Please send completed template, and/or any other feedback to [nigel.sisman@gie.eu](mailto:nigel.sisman@gie.eu) , cc. [gie@gie.eu.com](mailto:gie@gie.eu.com) by 31 August 2009.

Organisation:	Centrica
Name:	Helen Stack

**Q1: Does the programme identify the correct projects for GTE+ focus during 2008/2009?**

Answer	Further comments
Yes / no	

**Q2: Are there any other activities that should displace the focus areas identified?**

Answer
Yes / no

If yes;

What other priorities should be addressed?	We believe that the priorities are broadly correct. Instead, we would like to see more detail around the definition of the current proposed priorities and associated project plans.
Which elements of the plan should be displaced?	None.

**Q3: What areas should be considered for “pilots” to test the Third Package Framework Guidelines and Network Code development processes during the interim period?**

Views are sought on the desired scope of suggested areas that might be the focus of work during interim before the Agency and ENTSOG can be fully functional in their anticipated roles.

Area	Definition of scope
<p><b>Capacity</b></p>	<p>We have strong reservations about the choice of capacity to test the 3<sup>rd</sup> package framework. Capacity is likely to be a highly contentious issue and a wide range of Market Participants had strong reservations about certain core elements of the ERGEG proposals in its consultation on CAM and CMP principles for the European gas grid, in particular the proposal to restrict renomination rights. The complexity of the topic may also lead to delays: we note that a decision document is yet to be published on ERGEG’s January 2009 consultation.</p> <p>We recommend that a different, narrower topic is chosen, where a level of consensus already exists e.g. from existing guidelines for good practice and which avoids the issue of grandfathering rights.</p> <p>Once effective procedures have been established more contentious and complex areas can be addressed.</p> <p>If capacity is chosen, we suggest that the pilot is limited to a subset of the topic, such as primary capacity allocation. This could then build on the existing work done by GTE+ on capacity product co-ordination. Any principles in a code should apply to the whole transmission network and not just cross-border points.</p>
<p><b>Balancing</b></p>	<p>Balancing would be a good candidate for a code pilot. A preliminary scope has already been set by the GGP Balancing and a number of TSOs and regulatory authorities have been working on improvements to their balancing regimes. Greater and wider streamlining of balancing procedures should benefit the EU gas market from both from the point of view of competition and security of supply.</p>
<p><b>Transparency</b></p>	<p>Transparency would be the simplest candidate for a code pilot. This would allow GTE+ to build on the existing work done by individual TSOs in implementing the current Gas Regulation, as well as those TSOs involved in the transparency project in the GRI NW and the ongoing work by all market participants on the minimum transparency “Mintra” list put forward by users.</p>

**Q4: Are the objectives and deliverables associated with each plan realistic?**

<p>Organisational Development</p>	<p>We strongly support GTE+'s intention to carry out as much work as possible towards creating an effective ENTSOG in advance of the formal deadline required by legislation. This will help ENTSOG and stakeholders meet the demanding timelines set in the 3<sup>rd</sup> package for completing all codes once the legislation takes effect.</p> <p>The objectives and deliverables seem realistic. We urge regulators to ensure that TSOs are given timely permission to recover reasonable and efficiently based costs in order to support their participation in this process.</p> <p>GTE+ should consider offering some non-EU TSOs the role of observer status in ENTSOG, where this would facilitate gas market integration in the wider European area.</p>
<p>Capacity</p>	<p>We commented on the potential scope of a code on capacity in our answer to Q3. This Project Plan should be re-examined once ERGEG delivers its Pilot Framework Guideline.</p>
<p>Transparency Platform</p>	<p>We are pleased that GTE+ is taking a role in encouraging individual TSO compliance with EU transparency requirements.</p> <p>GTE+ could consider further developing the Transparency Platform to include a database of local TSO codes (network codes and if applicable individual codes on balancing, allocation etc.).</p>
<p>Ten Year Network Development Plan</p>	<p>The ENTSOG TYNDP, Winter and Summer Outlooks will rely predominantly on data provided by individual TSOs. GTE+ could develop a set of common minimum requirements for the individual TSO's TYNDP. As well as helping to ensure a minimum quality level for individual network plans and outlooks, this would facilitate the ENTSOG process.</p> <p>We have looked at the GTE+ July 2009 Demand Scenarios vs Capacity Report. Whilst we noticed improvements from the previous publication, it does not yet present a complete and accurate picture. We believe that some of the data is incomplete and that the report also uses a "worst case" scenario for future capacity levels as entry capacity is only based on investments for which the final investment decision has been taken.</p> <p>We welcome the ongoing emphasis on stakeholder dialogue in working towards the production of the final TYNDP and will be happy to provide more detailed feedback on the TYNDP and Winter Outlook as part of this process.</p>
<p>Winter Outlook</p>	<p>See response on TYNDP.</p>

Balancing	We welcome the addition of balancing to the work plan. The objectives and deliverables appear to be appropriate.
Code on Harmonization of Maintenance Publications	This will be a useful “quick win” objective. We note that the 3 <sup>rd</sup> phase is due to be completed by the end of 2009. GTE+ could therefore review member implementation of the harmonised procedures in 2010.
IT and Communications Roadmap	The objectives and deliverables appear reasonable.

**Q4: If delivered in a timely and responsive manner would the programme defined in this document constitute a significant step towards the development of the internal market?**

Answer
Yes / No

**Q5: Do respondents have any additional comments or remarks to make about:**

The proposals to establish ENTSOG	<p>GTE+ should recognise that, with the March 2011 deadline for implementation of the 3<sup>rd</sup> Package, some member will be occupied with the task of meeting the resulting organisation requirements place on them regarding effective separation. We are pleased that GTE+ is taking the initiative to begin work now on implementing the 3<sup>rd</sup> package. This will help ensure as much work can be done before TSO resources may become occupied in dealing with local implementation issues.</p> <p>In advance of the legally binding deadline for vertically integrated TSOs to comply with the further separation requirements of the 3<sup>rd</sup> package, we trust that GTE+ will encourage its members to conduct themselves in the trial code process as if they were already fully separated. In particular, market participants should be confident that the supply or trading affiliate of any other vertically integrated TSO is being treated at arms length and does not receive any preferential treatment during the trial code process.</p>
The Work Programme envisaged in this document	No.
Anything else?	No.

**Q6: Is there any advice/feedback you would like to offer GTE about how it can best facilitate the transition between today and implementation of the Third Package?**

The approach in the AWP is a good basis to facilitate the transition. The work of GTE+ can also be used by TSO's as a way of identifying best practice, which could help facilitate individual TSO implementation of the Third Package requirements.

**Q7: Would you like to meet with GTE members involved in each of the Project Areas and if so who would you suggest we contact within your organisation?**

Subject Area	Answer (Yes/No)	Contact name	e-mail	Telephone number
Organisational Development	Yes	Helen Stack	<a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a>	+44 7979 567785
Capacity	Yes	Helen Stack	<a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a>	+44 7979 567785
Transparency	Yes	Helen Stack Clive Woodland	<a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a> <a href="mailto:clive.woodland@centrica.com">clive.woodland@centrica.com</a>	+44 7979 567785
Ten Year Network Development Plan / Winter Outlook	Yes	Helen Stack Clive Woodland	<a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a> <a href="mailto:clive.woodland@centrica.com">clive.woodland@centrica.com</a>	+44 7979 567785
Balancing	Yes	Helen Stack	<a href="mailto:helen.stack@centrica.com">helen.stack@centrica.com</a>	+44 7979 567785
Procedure on Harmonization of maintenance Publication				
It & Communications Roadmap				

Please do not feel constrained by the sizes of the boxes above. GTE+ welcomes comprehensive feedback as critical part of establishing the GTE+/ENTSOG Work Programme

**Q8: Please could you indicate if your response can be published on our website.**

Answer
Yes / Æ