

**Gas System
Operator**

EU Update

Transmission Workgroup
1 November 2018

nationalgrid



CAM GT&C study – ACER Opinion

Background

- CAM NC Art. 20: ENTSOG required to develop standard template for the main terms and conditions for the offer of bundled capacity products

ACER Opinion

- ENTSOG has fulfilled its obligation under Article 20(2) of the CAM NC.
- The template is non binding, a document of soft-law, it doesn't impose harmonisation but merely promotes it.
- Its content is not strictly limited by the need carefully to assess the sphere of European Union competences.
- The Agency is of the view that the Template does not always go as far as would be desirable.

CAM GT&C study – ACER Opinion

ACER's Recommendations

- Widen its content and elaborating best practices for some points (when harmonization is not possible)
- Include in the template the red flag clauses affected by national law (without harmonization)

ENTSOG Actions

- ENTSOG currently amending template to take into account ACER's Opinion

ACER's report on conditional capacities

Background

- Art. 38 (4) NC CAM sets obligation to ACER by 6 April 2019
- To deliver a “report on conditionalities in firm gas capacity products to assess their effect on efficient network use and integration of Union gas markets”
 - Concern that many “firm” products in different regimes are more “firm-ish” with conditions
- ACER should be supported by the relevant NRAs and TSOs in study

ACER (its consultants) directly contacted TSOs for information

- Some concerns from TSOs on how the information will be used and therefore why it is being requested, which information will be published and in what way

Next steps

- ACER workshop on conditionalities in firm gas capacity products on 4th December 2018

Proposed changes on tariffs

Even though TAR NC not yet implemented, the conversation at EU level has begun on possible changes

- It is noted that both the CAM NC and TAR NC are silent on multipliers and more generally on capacity products for **non-IPs**
- Any changes may have less of an impact on GB system as UNC 0621 seeks to align IPs and non-IPs in areas such as multipliers and interruptible products etc.
- There may be further options considered for commodity charges and capacity discounts
- For example: for high-demand business users with a low load factor, amending the TAR NC in favour of optional specific products with high commodity charges could be beneficial
 - e.g. this is used in Portugal where users that have high demand but only on a certain number of days each year can have a discount on capacity but pay more on the commodity charge

Daylight saving issue

This issue is slowly gaining momentum – ENTSOG now exploring what this means for gas industry if seasonal change to day not applied

Note:

The draft legislative text: https://ec.europa.eu/commission/sites/beta-political/files/soteu2018-discontinuing-seasonal-changes-time-directive-639_en.pdf

Article 1

- 1. Member States shall not apply seasonal changes to their standard time or times.*
- 2. Notwithstanding paragraph 1, Member States may still apply a seasonal change of their standard time or times in 2019, provided that they do so at 1.00 a.m., Coordinated Universal Time, on 27 October 2019. The Member States shall notify this decision in accordance with Article 2.*

Article 2

- 1. Without prejudice to Article 1, if a Member State decides to change its standard time or times in any territory under its jurisdiction, it shall notify the Commission at least 6 months before the change takes effect. Where a Member State has made such a notification and has not withdrawn it at least 6 months before the date of the envisaged change, the Member State shall apply this change.*
- 2. Within 1 month of the notification, the Commission shall inform the other Member States thereof and publish that information in the Official Journal of the European Union.”*

FUNC Issues Overview (<http://www.gasncfunc.eu/>)

No	Posting party	Description	Next steps	Step date
1	Equinor + 3 others	Communication protocol encryption	Publication of the solution	Early 2019
2	Easee-Gas	Gas Role model	Discuss with Easee-Gas	October
3	ERU	Tariff methodology	Issue withdrawn by user	N/A
4	GTS	CAM NC text ambiguity in VIPs creation	Issue closed post resolution	22 August
5	EFET	Ex-post interruptible cap. discounts	Issue closed post resolution	5 July
6	GMT	Fallback solution for failed DA auctions	Publication of the solution	End December
7	GMT	Data reliability	Publication of the solution	September
8	EnC / UTG	INT NC on IPs 3 rd	Finalise proposal	End December
9	Easee-Gas	One invoicing format	Closing of the issue	October
10	EFET	Inconsistencies in publication of reserve price information	Develop response	Ongoing

Agency Analysis on the national tariff consultation documents

The consultation process should be finalised by 31 May 2019 as per Article 27(5).

The Netherlands (closed): [National Consultation](#) | [Template](#) | [ACER Report](#)

Sweden (closed): [National Consultation](#) | [Template](#) | [ACER Report](#)

Northern Ireland (closed): [National Consultation](#) | [Template](#)

Romania (closed): [National Consultation](#)

Denmark (closed): [National Consultation](#)

Portugal (closed): [National Consultation](#) | [Template](#)

Slovenia (closing date: 31 October): [National Consultation](#) | [Template](#)

Poland (closing date 31 October 2018): [National Consultation](#) | [Template](#)

Poland West Europe transit gas pipeline (closing date 31 October 2018): [National Consultation](#) | [Template](#)

IUK (closing date 3 November 2018): [Consultation](#)

Belgium (closing date 7 December 2018): [National Consultation](#) | [Template](#)

Greece (closing date 11 December 2018): [National Consultation](#) | [Template](#)

Germany (closing date 17 December 2018): [National Consultation](#)

Other issues

Charging Review/UNC 0621

- Awaiting impact assessment of 0621 (and alternates) from Ofgem
- Industry discussion ongoing on developing methodology for Forecast Contracted Capacity (key parameter for future Reference Price Methodology)
- Proposed review of shorthaul methodology under discussion
 - <https://www.gasgovernance.co.uk/ntscmf>
- Implementation of 0621[x] still regarded as being on track for delivery in 2019

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