1 Personal details

Editor	Name	Company	Contact email	Phone	Country
PC-04-GL-GBiTS					
PC-04-ANIGA-S					
PC-04-BNEON-G					
PC-04-CENTR-V	Helen Stack	Centrica	helen.stack@centrica.com	44 7979 567785	United Kingdom
PC-04-CEPSA-G					
PC-04-CEPSA-O					
PC-04-DELRI-L	Rafael Del Rio	IBERDROLA, S.A.	rafael.delrio@iberdrola.es	+34 91 7842199	Spain
PC-04-DONGE-N					
PC-04-ECONG-T	Christian Sidak	EconGas GmbH	christian.sidak@econgas.com	+43 (0) 50205 8413	Austria
PC-04-EDFEN-G					
PC-04-EDISO-H	Monica Immovilli	Edison SpA	monica.immovilli@edison.it	+39 02 6222 7397	Italy
PC-04-EFETF-A					
PC-04-ENAGA-S					
PC-04-ENERG-I					
PC-04-ENIGA-V	Roberta Stucchi	Eni Gas & Power	roberta.stucchi@eni.com	+39.02.520.31757	Italy
PC-04-EURBE-4	MANUEL COXE	EUROPEX	manuel.coxe@europex.org	+3225123410	Belgium
PC-04-EXXON-M					
PC-04-GASBV-H	Ivelina Boneva	GasTerra B.V.	ivelina.boneva@gasterra.nl	+31 50 364 8389	Netherlands
PC-04-GASLI-D					
PC-04-GASNA-N	carmen vindel	gas natural fenosa	cvindel@gasnatural.com	+34 91589 28 39	Spain
PC-04-GDFSU-5	European Affairs	GDF SUEZ	amine.dalibey@gdfsuez.com	0033144225395	France

PC-04-GEODE-5	Christian Thole	GEODE	info@geode.de	+4930611284070	Germany
PC-04-GOTTJ-L	Gottmer	CEDEC	joost.gottmer@alliander.com	+31653739260	Netherlands
PC-04-IFIEU-D	Gareth Davies	IFIEC Europe	daviesg@cia.org.uk	+0044 (0)207 963 6743	United Kingdom
PC-04-INITI-G					
PC-04-INTER-07	Alan Coulson	Interconnector (UK) Limited	alan.coulson@interconnector.com	+44 (0) 20 7092 6500	United Kingdom
PC-04-JPMCH-9	Catherine Sutcliffe	J.P. Morgan	catherine.a.sutcliffe@jpmchase.com	02077422722	United Kingdom
PC-04-LOUDM-T	MARGOT LOUDON	EUROGAS	mal@eurogas.org	+32 2 894 48 03	Belgium
PC-04-MOQAE-S	MOQUET	EDF	Anne-Elisabeth.moquet@edf.fr	+33613932734	France
PC-04-NATUR-D					
PC-04-NATUR-U	Mikel Amundarain	Naturgas Energia Comercializadora (EDP Group)	mikel.amundarain@naturgasenergia.com	0034 94 657 21 21	Spain
PC-04-NGRID-G					
PC-04-NIGES-G	Nigel Sisman	ENTSOG	nigel.sisman@entsog.eu	+447778030716	Belgium
PC-04-NITSC-Q	Christian Nitsche	EnBW AG	ch.nitsche@enbw.com	+49 721 63-23076	Germany
PC-04-OGPBE-L	sam phillips	OGP	sam.phillips@ogp.be	+3225669150	Belgium
PC-04-OPENG-G					
PC-04-OSULB-P	Bryan	O' Sullivan	bosulliv@gaslink.ie	+353215006115	Ireland
PC-04-PEAAN-Y	Andrew Pearce	BP Gas Marketing	andrew.pearec2@bp.com	0044207948 4027	United Kingdom
PC-04-POWEO-Q	CHIFFAUT Sébastien	POWEO SA	sebastien.chiffaut@poweo.com	+3317060125 3	France
PC-04-RANGB-W	Bernardo Rangoni	EURELECTRIC	brangoni@eurelectric.org	+3247899145 6	Belgium
PC-04-RWEST-G					
PC-04-SEDIG-A					
PC-04-					

SEDIG-U					
PC-04-SHELL-S	Amrik Bal	Shell Energy Europe Ltd	amrik.bal@shell.com	+44 20 7546 2460	United Kingdom
PC-04-SORGE-6	Valentina Giust	Sorgenia S.p.A.	valentina.giust@sorgenia.it	0039 02 67 194 395	Italy
PC-04-SSEUK-K	Mike Heslop	SSE	mike.heslop@sse.com	+44(0)1738 457171	United Kingdom
PC-04-STECK-X	Sina von Ketelhodt	E.ON AG	marketregulation@eon.com	+49 211-4579-4804	Germany
PC-04-STEKA-T	Dr. Michael Wunnerlich	BDEW German Association of Energy and Water Industries	michael.wunnerlich@bdew.de	+32 2 771 9642	Belgium
PC-04-SYKCH-Q	Christiane Sykes	Statoil (UK) Ltd	csyk:@statoil.com	0044 7824 310 961	United Kingdom
PC-04-THUGA-V	Eva Hennig	Thüga AG	eva.hennig@thuega.de	0049-163-8625733	Germany
PC-04-TOTAL-G					
PC-04-UNIDE-8	Claire Bertrand	UNIDEN	claire.bertrand@eu.rhodia.com	+33153566141	France
PC-04-UPRIG-F	RAOUX Alain	UPRIGAZ	uprigaz@uprigaz.com	33014744622	France
PC-04-VEGAJ-I	José Vega Aguado	ENAGAS	jvega@enagas.es	+34 630 385 287	Spain
PC-04-VERBU-L	Walburga Hemetsberger	VERBUND AG	walburga.hemetsberger@verbund.com	+32 2 227 1151	Austria
PC-04-VOEGN-M	Patrick Postema	VOEG	patrick.postema@voeg.nl	+31 623147465	Netherlands
PC-04-WATER-A	Nicholas Wye	Gas Forum	nick@waterswye.co.uk	441295750099	United Kingdom

2Please, provide your comments here (in case you exceed 3.500, add the rest to point 3)

Maximum length: 3500 characters

Editor	
PC-04-GL-GBiTS	
PC-04-ANIGA-S	
PC-04-BNEON-G	
PC-04-CENTR-V	Centrica welcomes the opportunity to comment on the ACER Framework Guideline on gas balancing rules

	As a shipper and supplier in the EU networks with gas production, wholesale trading and energy retail activities, balancing is a key network access issue for us and we are pleased that it has been chosen as one of the first topics for code development along with capacity access issues. Centrica broadly supports the approach set out by ACER in the Framework Guidelines. Centrica believes that a good EU-wide model for gas balancing includes: - a balancing period of a standard gas day with single end-of-day cashout - TSO procurement of balancing services on the wholesale traded markets - imbalance charges based on actual costs incurred, using marginal prices to incentivise individual shipper balancing - TSO obligations to minimise system balancing costs - excellent information provision by the TSO on system status, noting that updates on demand forecasts from non-daily metered customers may need to be more frequent that 2 times a day. Centrica agrees that optional within-day obligations may be needed in some markets to achieve daily balancing. As recognised in the Guidelines it is vital that these are kept to a minimum and do not result in undue discrimination between different system users. ENTSOG will need to work closely with market participants to ensure these obligations are appropriate and are matched with sufficient information provision. We believe ACER should be closely connected to the development of these and take responsibility for ensuring that any such obligations do not harm efficient operation of the market or unfairly penalise individual network users. Given the different levels of gas market development throughout the EU, we support the proposed approach of using pre-defined interim steps to facilitate TSOs moving towards the target model. We welcome the emphasis in the Guidelines on NRA and ACER monitoring of the use of interim steps to ensure that TSOs move towards the agreed target as quickly as possible. As a final comment, ACER and the European Commission need to work closely together to ensure that all the elements in the CAM, CMP, balancing and tariff guidelines work effectively when combined together. We welcome the more frequent presence of ACER and EC representatives in the ENTSOG stakeholder sessions.
PC-04-CEPSA-G	
PC-04-CEPSA-O	
PC-04-DELRI-L	
PC-04-DONGE-N	
PC-04-ECONG-T	
PC-04-EDFEN-G	
PC-04-EDISO-H	Edison endorses the scope and the objectives of the ACER Framework Guidelines on Gas Balancing: the development of harmonised market-based balancing mechanisms across Europe represents a crucial step towards an effective integration of gas markets. Though generally supporting ACER's proposals as tools to improve the management of balancing issues in different European countries, we would like to recall your attention on two points which generate some concerns: - the imposition of specific obligations relating to network users' inputs and off-takes during the gas day; - the possibility of balancing against pre-defined forecast of off-take volumes for non-daily metered customers, foreseen as a possible option for the target model. As concerns the introduction of within-day constraints, Edison believes that the

	FG shall not leave to the Network Code the possibility to introduce restrictions which are targeted to specific categories of network users or entry/exit points. This kind of approach could in fact result into discrimination among different market segments, besides giving origin to cases of cross-subsidisation. Moreover, the introduction of different within-day constraints in each system, would delay the process of harmonisation of balancing mechanisms. For the reasons above, we call for: - a careful definition of possible within-day constraints; - a non discriminatory design of the constraints to avoid negative and inefficient consequences that could result from the imposition of specific obligations on a limited number of users (and consequently customers). With reference to the possibility of balancing against pre-defined forecast of off-take volumes, Edison envisages the risk that such an approach could result in: - A discrimination among different categories of network users (and customers), since shippers balancing against pre-defined profiles will know in advance against which volumes they will have to balance on the following day. - A reduction of the balancing responsibility of shippers, in contrast with what is stated by Guideline 2.1, - A transfer of costs among different market segments. For this reason, Edison expresses her strong preference for the option which leaves to network users the duty to balance their position on the basis of timely and clear information provided by the TSOs. Furthermore, we are strongly convinced that, in order to make the obligations for TSOs to provide information effective, the FG should require TSOs to play a pro-active role in collecting and publishing the more information they can get, also by warning the owners of the metering devices on the necessity to make the data available in a timely manner for balancing purposes. The introduction of obligations on DSOs and other owners of metering devices could facilitate TSOs in this task. We would invite ACER to read the attached document to find additional and more operational motivations in favour of our requests, as well as a concrete proposal to amend the text of the FG to address possible drawbacks.
PC-04-EFETF-A	
PC-04-ENERG-A	
PC-04-ENERG-I	
PC-04-ENIGA-V	
PC-04-EURBE-4	EUROPEX welcomes the Public Consultation by ACER on "Framework Guidelines on Gas Balancing in Transmission Systems" and thanks for the opportunity to take part in the consultation. See more in the attached file...
PC-04-EXXON-M	
PC-04-GASBV-H	Please, see attached file.
PC-04-GASLI-D	
PC-04-GASNA-N	
PC-04-GDFSU-5	
PC-04-GEODE-5	GEODE's major concern is the clarification of the role and the responsibilities of the DSOs in the Gas balancing System. DSOs are not explicitly included in the process of network codes but also in the Framework Guidelines. It should be clarified that not all market roles and func-tionalities of the DSOs must be

	harmonised to design a uniform European balancing system. In this respect, it is important to emphasize that GEODE does not wish to prevent a harmo-nised European market, but just wishes to safeguard the legitimate interests of the distribu-tion system operators. Also in a regulated system, the interests between TSO and DSO are not always the same. I. Harmonisation of market roles / the role of DSOs Major concerns are expressed that the market roles and responsibilities of distribution sys-tem operators, which indeed are very different in the individual Member States, shall be har-monised by establishing uniform balancing rules across Europe. In this context, it is clear (which is also the explicit position of GEODE) that the FG/NC on Gas Balancing must put procedures into place that will lead to a certain harmonisation of the balancing regime. This applies particularly to the information requirements of the shippers (scope of data, data qual-ity and periods for data transmission), the procurement of TSO Balancing Gas as well as the pricing of the shippers' imbalances. It also applies to general standardizations such as bal-ancing periods (daily balancing) and the common gas day. The market roles and responsibilities held by distributors need not be harmonized if they do not adversely affect the balancing regime in general. Naturally, it must be ensured that the shipper receives its information from the TSO. Who, for instance, will gather such information and will be in charge of the collection and aggregation of data, has got nothing to do with the actual balancing regime, though. Examples in this respect are systems established in Great Britain, the Netherlands, Germany and Spain. II. Remarks on Section 6 (1) The obligations in the FG concerning the transmission of consumption data for me-tered customers and, particularly, the required daily updates of forecasts for non-metered customers are too concrete for the FG. This means considerable expenses on the one hand for the system operators, who must then roll out the load profiles several times a day and on the other hand for the shippers, who have to react to the load profile forecasts. We would therefore like to challenge the sense as well as the purpose of this regulation. It would be sufficient to provide for the principle that the shipper may obtain sufficient information to keep his portfolio in balance and avoid imbalance charges. The con-crete requirements should be left to the Netcode. Only in this way, TSOs together with the DSOs may find cost-efficient and system-appropriate solutions. This applies especially to non-metered customers, since these are nearly exclusively cooking gas customers, especially in Southern Europe. At least, the possibility that the regulators may provide for a gradual and phased im-plementation and propose alternative solutions on the basis of a cost-benefit-analysis should be included in the FG. However, it must be explicitely clarified that the costs incurred for the DSOs will be approved via the national use-of-system-charges regu-latory systems without delay.
PC-04-GOTTJ-L	o CEDEC welcomes the work done by ACER on the common and coordinated treatment of issues concerning Gas Balancing, which seems a positive step in the developing Gas market. CEDEC would like to express thanks to ACER for the opportunity to participate in this consultation. CEDEC support the objective in the framework guideline to promote the harmonisation of balancing regimes. We agree that balancing rules can not be seen without network related rules, rules for charges and rules for the operational balancing. However we would also like to point out that between member states there are many differences and specific circumstances requires specific measures. Therefore we suggest to ACER to not overregulated and leave the details to the NRA's. o Chapter 2; paragraph 2.1; CEDEC support the vision of ACER that network users are the only ones responsible for the imbalances between inputs and off-takes of the entire system, including the distribution system. Imbalance charges should therefore be carried by the network users only o Chapter 4, paragraph 4.1; CEDEC support a 6.00 to 6.00 (CET) gas-day, we ask ACER to take into account the difficulties that member states and small energy companies could have if they have to change to the prescribed regime; especially if the current regime is coupled with the power-day of electricity. o Chapter 6, 4th paragraph CEDEC strongly disagree with the image that DSO's are only there to let TSO comply to the requirements. DSO's are an indispensible part of the gas value chain for instance in providing information and must be

	treated as an equal partner for these and other rules to TSOs and NRAs. o Chapter 6, 5th paragraph CEDEC does not support the general view that this paragraph provides that a forecast of non daily metered consumers should be updated twice a day during the balancing period. This rule is only valid in a few specific countries. We would like to point out that non-daily metered customers (households) especially those in southern Europe mostly use gas for cooking, furthermore this requirement is – due to increased energy efficiency rules for buildings – also in northern Europe a rule that losses applicability. We therefore suggest to ACER to investigate the proportionality of this rule, and it's information provision.. o Chapter 8, 1st paragraph. CEDEC would like to point out that being compliant within 12 month, is very ambitious and perhaps even be not very realistic if taken in to account the changes to their information systems that DSOs have to do. Let alone the uncertainties and discussions with the NRA about their cost recovery of the investments. We suggest a longer – at least 24 months – implementation period for DSOs.
PC-04-IFIEU-D	
PC-04-INITI-G	
PC-04-INTER-07	
PC-04-JPMCH-9	We are writing in response to ACER's consultation on gas balancing in transmission systems and are pleased to have this opportunity to share J.P. Morgan's views with you on the proposals raised in this consultation paper. Please find attached a letter setting out our views on the issues raised. We have copied the content of the letter into the comment box below and have placed a hardcopy in the post.
PC-04-LOUDM-T	Eurogas endorses the scope and objectives of the proposed FG on Gas Balancing. The FG and the eventual Code should aim for harmonization of balancing regimes across Europe. Although Eurogas prefers that daily balancing with end-of-day cash out should be the target model, some flexibilities can be permitted to reflect the different historical characteristics of existing network infrastructure, through the use of pre-defined interim steps towards that target model. Where interim steps are allowed, the FG should make it clear that proper and timely implementation of other aspects of the broader target model described will still be necessary in order to benefit the development of the EU gas market. Therefore Article 1.5 offers a pragmatic way forward but should be more compelling, Eurogas would favour a continued monitoring and reassessment of the need for permitted flexibilities by the NRA, as well as ACER to avoid the risk that NRAs have too much discretion in their decisions. Eurogas welcomes the stronger emphasis given to the aim of a market-based balancing regime that minimizes the role of the TSO and boosts the role of the network user. This should be achieved, primarily by incentivising shippers to keep their portfolios balanced. Article 4 does not contain an interim step in the move towards daily balancing. Given the current technical and economic differences in European transmission networks, it may be appropriate to allow for an interim step for the balancing period. On a case by case basis, the balancing regime may be permitted to include a range of within-day constraints or obligations that are appropriate to the local market, while it should be clearly stated in 4.1 that these should not result in within-day imbalance charges. If the application of within-day constraints is therefore limited to certain groups of network users, the NRAs should have to demonstrate that they are necessary to secure a safe and economically efficient management of the system and should ensure that this does not result in any discrimination or create barriers to network users operating in the market. The wording on 4.1 should therefore not only focus on new network users in this

	context. The comprehensive approach could then allow a focused target model to be defined in the Network Code, while pre-determined off-take profiles and the use of tolerances or other acceptable within-day constraints should clearly be restricted to the interim model. Eurogas welcomes the emphasis on TSO information provision obligations in Article 6 but considers that the appropriate time intervals need to be stricter. Article 8 should specify that TSOs have to consult with system users in drawing up a roadmap about moving away from interim steps.
PC-04-MOQAE-S	EDF welcomes the opportunity to comment the ACER version of the framework guidelines on gas balancing in transmission systems. In the previous consultation led by ERGEG in October 2010, EDF already expressed its position on what was expected in the Framework Guidelines for gas balancing. These remarks are still to be considered. Moreover, on the specific text of ACER, EDF would like to add a few comments. Concerning the interim measures in balancing obligations related to shippers and TSO responsibilities (paragraph 2.2): EDF agrees with the option of keeping a certain degree of tolerance as long as TSOs have enough flexibility that they cannot sell, or as long as TSOs are not able to provide information on the consumption metered during the balancing period (non-daily metered customers). Concerning the buying and selling of flexible gas and balancing services by TSOs (introduction of paragraph 3): EDF agrees with the target of TSOs' procurement on the wholesale market to balance the system. The balancing system shall enable shippers to balance their positions on the market first and then TSOs shall ensure the residual balancing. The implementation of such a system implies a sufficiently liquid wholesale market and an improvement of the quality and quantity of information provided by TSOs. In addition, the storage capacity currently held by TSOs for balancing the system shall be released. Concerning the balancing period (paragraph 4.1) and the mention of specific "within-day obligations": EDF thinks that within-day obligations shall not discriminate against specific categories of users. If such constraints have to be put in place in order to ensure system integrity, they shall be applied in a fair way to all users. As far as imbalance charges are concerned (paragraph 5.1): It is proposed that: "The network code on gas balancing shall set out that, where TSOs use either the wholesale market or a balancing platform to buy or sell balancing gas, the imbalance charges shall be based on the marginal sell price or the marginal buy price." In this case, EDF thinks that if imbalances charges recovered by TSOs are in excess of the effective balancing costs, these should be passed back to users according to a mechanism defined in consultation with market players and approved by NRAs.
PC-04-NATUR-D	
PC-04-NATUR-U	Scope/Objective/Implementation • In our point of view it is very important to promote the harmonisation of balancing regimes in order to encourage and facilitate gas trading across systems and to support the development of competition within EU. In the process to get that goal, we agree that it should be possible to establish interim steps. But, on the other hand, it is essential to keep a minimum level of coherence and coordination in the implementation of balancing rules between neighbouring

	balancing zones, in order to avoid distortions between systems. Moreover, regarding transition periods, we think that it should define a specific timetable for the harmonization stages in order to avoid "different speeds" between system which generate inconsistencies and inefficiencies that distort the way to get goals set out by the 3rd package. • On the other hand, it is of utmost importance to design a balancing regime that allows customers to receive the gas they need when they need it. This situation will become even more evident and challenging in the next few years, when power generated from gas-fired stations will have to flexibly back-up the foreseen growth of intermittent renewable generation, namely wind and solar energy. In doing so, NRAs and TSOs should keep in mind that power stations represent customers that need significant but varying amount of gas under different circumstances. Roles and responsibilities • In the same way that ACER´s propose, and as we said in the context of the ERGEG´s public consultation about "Gas Balancing Rules on European Gas Transmission Networks", we believe that balancing activities should be taken primarily by market users, with the TSO being responsible for the supervision of the system's integrity and for making available to market players adequate levels of flexibility (especially when CCGTs and LNG terminals are in place) such as tolerance ranges provided by TSOs. • In our point of view, the differences between natural gas and other products or goods (as electricity) should be considered in the definition and development of gas balancing rules, and especially the storage possibility. In this way, tolerance level should be considered, not only as an interim step. If this is not considered, system and shippers operation will be "artificially" limited and restricted, losing one of the most important flexibility of gas natural systems. In our opinion, it is important to keep this flexibility in order to get an adequate balance between security of supply/operation and market based rules and references. Balancing period • An EU-wide gas day definition can be useful, especially for cross border operations. Nevertheless, the definition of a specific gas day for all European countries should be preceded by a careful analysis of each market specificities since in some countries, like Spain and Portugal, the gas day timetable is linked to the "electricity day". In this way, in our point of view, it is important to keep this link between "electricity day" and "natural gas day", at least in those cases where CCGTs have a relevant participation in the electricity generation (e.g. Spain and Portugal).
PC-04-NGRID-G	
PC-04-NIGES-G	Response to ACER Balancing Framework Guideline consultation (DFGC-2011-G-002) Dear Csilla Thank-you for the opportunity to respond to the above consultation. The proposed text provides an excellent start point that can be used to deliver a robust , precise yet concise Balancing framework guideline to inform the network code development. Our response has been approved by written procedure addressed to the entire ENTSOG membership. It is delivered in the single document provided by a document upload via your website (document reference: BAL060-11)

	Our response includes an annexe that requests some specific amendments to the proposed framework guideline based upon rationale found earlier in the document. These text amendments have been limited to those that were easy and straightforward to make in the current text, without changing structure of document or making significant changes to definitions. ENTSOG welcomes an opportunity to further interact with ACER during the next few weeks as the framework guideline evolves to its final form. This will afford an opportunity for ENTSOG to share its work plan to prepare for the network code development and to understand in more detail the intent of some of the sections in the proposed code, which will be essential as the framework guideline will form the basis for further work by ENTSOG. ENTSOG would also welcome an opportunity to contribute to and review amendments of the framework guideline prior to its finalisation. ENTSOG looks forward to receiving the invitation to develop the balancing network code during September 2011 based upon the finalised framework guideline. Best regards Nigel Sisman On behalf of ENTSOG
PC-04-NITSC-Q	Dear Madam/Sir, As it was the case back in October 2010, when ERGEG published the Pilot Framework Guideline on Gas Balancing Rules on European Gas Transmission Networks, EnBW welcomes the opportunity to comment on ACER's consultation on its "Draft Framework Guidelines on Gas Balancing in Transmission Systems". Due to the close connection of these two consultations, we would like to emphasize the validity of our statements made in response to the Pilot Framework Guideline consulted by ERGEG. Therefore you will find enclosed said response. We hope the questions answered within will help identify and clarify those topics that are particularly crucial for harmonising the European balancing rules. We remain at your disposal should you have any further enquiries. Kind regards. Yours sincerely EnBW Energie Baden Württemberg AG i.A. Christian Nitsche
PC-04-OGPBE-L	
PC-04-OPENG-G	
PC-04-OSULB-P	
PC-04-PEAAN-Y	
PC-04-POWEO-Q	
PC-04-RANGB-W	EURELECTRIC calls for further information as to the Governance of the Networks Code(s) post completion, and in particular clarity in relation to how they will be modified to suit changing circumstances. Concerning the comments to ACER draft Framework Guidelines for Gas Balancing, (for practical reasons) please find them directly in the draft text in track changes mode.
PC-04-RWEST-G	

PC-04-SEDIG-A	
PC-04-SEDIG-U	
PC-04-SHELL-S	
PC-04-SORGE-6	Sorgenia agrees with the scope and the general provisions specified by ACER in these Framework Guidelines, pursuing the previous work carried out by ERGEG. As particularly regards the current Italian balancing system, imbalance charges do not reflect the cost incurred by the TSO in balancing the transmission network. This, together with a discriminating mechanism for access to storage capacity and the absence of a liquid wholesale market, represent an obstacle for new entrants to balance their portfolios, increasing their exposure to imbalance charges. In addition, network users have to face a lack of information on their portfolio imbalance, especially with reference to the information on NDM points' off-takes. We believe that it is essential for a market-based balancing mechanism to work efficiently and for the development of competition in the gas market, the provision of a fair access to the essential balancing resources, with particular reference to storage capacity. We suggest the introduction of a well functioning secondary market for storage capacity together with a provision for freeing up capacity not utilized by shippers, at least on interruptible basis, in order to allow an optimization in the use of balancing resources. In our opinion, the Network Code shall in general avoid any kind of discrimination among network users with particular reference to the availability and the utilization of different flexibility resources. We agree with ACER in giving primary balancing responsibility to network users, with a gradual reduction of TSO's role in balancing activities. However, with a specific reference to the Italian case, we believe that such a provision should be implemented only after an appropriate improvement in the availability for shippers of timely and reliable data on the system and on their portfolio balances, together with a more efficient load profiling system, in order to allow them to better forecast their off-takes and reduce their imbalance exposure. As regards the allocation of TSO's linepack to network users, we believe that the Network Code, pursuing the objective of system costs minimization, shall define a transparent mechanism for linepack allocation in order to prevent any kind of incentive for TSOs to use linepack in an arbitrary and speculative way. This will require, in our opinion, a constant monitoring by NRAs on TSOs activity. We agree with the implementation of interim steps, but we highlight the importance to leave to NRAs enough flexibility to decide whether to modify these measures, in order to cope with the peculiarities of each national system. Interim steps will also grant both network users and TSOs a transition period in which they can adapt their operational systems and procedures to the forthcoming balancing mechanism, taking advantage from a learning period and being only gradually exposed to economic risk. We believe that the definition of tolerance levels will address in particular the needs of small operators and new comers while allowing national wholesale markets liquidity to increase. However, Sorgenia believes tolerance levels shall be set equitably across all classes of final customers, but they even shall be sized in order to avoid excessive penalties on small operators and market dostorsions. The Network Code shall also define a process of gradual reduction of tolerance levels.
PC-04-SSEUK-K	SSE welcomes the chance to respond to this consultation. SSE is the second largest generator in the UK, with over 11.5GW of generation capacity and the second largest energy supplier. Our businesses include transmission, distribution (not represented here), and North-Sea gas. We are involved in most parts of the gas supply chain, from production, transportation, supply and consumption in our gas generation. Overview SSE welcomes the overarching principles and objectives set out in this consultation. Liberalisation of the UK energy markets has delivered cheaper energy to consumers than might otherwise have been the case; the proposals should enable this to happen across all participants. Whilst we welcome the proposed changes, we anticipate that they should not change the efficient trading arrangements in the UK.

	It is vital industry views are incorporated as harmonisation of EU gas networks is developed, to ensure they reflect the practicalities of operating in gas markets. SSE therefore agrees with the key aims of the Framework Guidelines on gas balancing. We feel that it sets out clear principles for the development of a network code on gas balancing. Adoption of Article 21 We agree that the network code on gas balancing should adopt the provisions in Article 21 of the Gas Regulation, including that there should be definitions of gas balancing rules that are fair, non-discriminatory, based on objective criteria and which are market-based, for best functioning of the market. In terms of the implementation of Article 21, we support the view that there should be the following attributes: • Balancing rules, including network-related rules on nominations procedures; • Rules for imbalance charges; • Rules for operational balancing between TSOs' systems as required by Article 8(6)(j) of the Gas Regulation; • The balancing regime on gas balancing should include cost-reflective imbalance charges to the extent possible, set on the basis of the marginal price, to the extent possible where energy and network balancing actions are taken together, so as to incentivise network users to balance their portfolio efficiently; • Network users should receive up to date information on their own balancing position, as well as the system's balancing status during the balancing period; and, • Minimise the TSO's role in balancing and increase that of market participants. Balancing Period and Nominations Procedures We agree that there should be a standardised daily interval at the end of which network users are cashed out for any deviations, as accumulated over the course of the preceding 24 hours, between their inputs into and off-takes from the system. • We suggest that the time period selected for a gas day should be 06:00 to 06:00 GMT. The UK market has found this time period offers no significant operational problems and we would suggest continuing with this time period. In the UK this is distinct from the electricity day to avoid any step change in trading in either market. TSO Information Provision Obligations We agree that TSO's should provide aggregate network user input/off-take information in a clear, timely manner, to all network users. Cross Border Cooperation We agree that TSOs should cooperate in the integration of European gas markets by merging entry-exit zones, creating cross-border balancing zones where reasonable, or through other means such as market coupling.
PC-04-STECK-X	E.ON welcomes the opportunity to comment on the Framework Guidelines (FGs) on Gas Balancing in Transmission Systems. In the draft FG, we have identified a number of issues that we would like to comment on: - E.ON supports the establishment of a common approach to balancing arrangements across all member states, but to achieve this, ACER will need to build the widest possible consensus on that common approach. In our view this requires the Network Code (NC) drafting process to be as effective as possible by ensuring early participation and involvement of stakeholders.. There should be a requirement for ENSTOG to explain why it has, or has not, addressed particular points raised by consultees in each of the public consultations. An impact

	assessment including a full evaluation of the costs and benefits to market participants should also form part of the final consultation on the NC. - We agree that information communicated by the TSO about the individual balancing status is very important and that the balancing status of the system and day-ahead prognoses for SLP-customers should be updated at least twice a day. Information should, however, not be restricted by its 'availability'. - The criteria for nomination and renomination procedures have to guarantee that network users are able to adjust their balancing status throughout the day. - We agree that harmonization progress should be monitored to assess and identify possible mergers of Entry-Exit (i.e. balancing) zones. However, we do not believe that the future Network Code on Balancing is the right place to oblige TSO to do studies on the feasibility of market coupling, as this is just one of many options. - Cross border balancing by TSO should be ruled out by the FGs as TSO would inevitably have to use transport capacity for it which should rather be made available to network users. - Within-day obligations should be limited to technical restrictions, i.e. particularly ramp rates, scheduling obligations, nomination lead times. Any within-day obligations should be subject to an exemption granted by the relevant NRA after consultation with market participants. Obligations going beyond technical restrictions are not necessary to maintain system stability. If ACER nevertheless deems such obligations necessary, they should be clearly defined in the FG. ACER should at least include a general rule that no within-day obligation should be eligible that is not complemented by a timely supply of information on each network users' individual balancing status that enables him to steer his flows in a manner that would avoid charges. For more details on these issues and some additional remarks, we have attached a table (Appendix I).
PC-04-STEKA-T	Abstract: BDEW position on the ACER Pilot Framework Guidelines on Gas Balancing in Transmission Systems BDEW welcomes the opportunity to comment on the ACER Consultation Paper. We believe that a harmonised European balancing system should lead towards a level-playing field for shippers and suppliers to develop competition in all market segments. Compared to the ERGEG Pilot Framework Guidelines on gas balancing rules, the present consultation document is more precise in many points. BDEW welcomes the higher degree of specificity due to definitions and exemplifications as it leads to clarification. We stress that the framework guidelines (FG) should outline the overall rules. Details should be developed in the network code where the wide range of gas grid systems in Europe and the different stages of the gas markets can be taken into account. We think the following aspects are crucially important for an efficient harmonised balancing scheme in Europe: • Introduction of "within-day obligations": Within-day obligations relating to the network users' inputs and off-takes are essential to ensure system integrity and should be a part of the balancing regime. The "within-day obligations" are too vaguely described in the FG. BDEW would appreciate further speci-fication on this instrument before assessing its potential effects. The unspecific charac-ter of the obligation can lead to varying implementations in the different member states and thus can impede the development of one single playing field. The concrete possibili-ties for within-day obligations should be described in the network code, in order to allow NRAs to choose the individually best flexible solution for the respective country.

	• Incentives for balancing actions during the day: Incentives for (within-day) balancing actions by market participants are important to avoid a broad socialising of within-day balancing costs. The incentives proposed in the FG reflect the market-based orientation of the balancing rules. The adequate implemen-tation in the network code can help to achieve the policy objectives of one internal en-ergy market. With the introduction of a balancing system which provides two possibilities for portfolio management in Germany, competition there has increased considerably for all daily me-tered end-users; especially small shippers have entered the market. Further information on the functioning and the good experiences with the German system please find in the text attached. • Standardisation of the balancing period and balancing products: BDEW welcomes the proposed standardisations of the gas day and of balancing prod-ucts. The balancing period is an essential characteristic of the balancing system, and different periods would lead to substantially different market designs. One common European balancing period – without interim steps – leads to a harmonized and liquid European gas market. The standardisation of balancing products allows for comparability and trading on differ-ent market places and thus enhances the functioning of the market. BDEW's position on the entirety of the FG is laid out in the text attached providing further in-formation with regard to our views additionally on • information obligations; • procurement via balancing platforms; • common criteria for the nomination and renomination procedure; • ENTSO-G reviews; • 12-month implementation period.
PC-04-SYKCH-Q	
PC-04-THUGA-V	The Thüga AG in Munich has minority shareholdings in 90 German public utilities forming the Thüga group serving approx. 2.2 million gas customers and 3.1 million electricity customers in Germany. Thüga appreciates the opportunity to comment on the ACER´s draft Framework Guidelines (FG) on Gas Balancing in Transmission. In addition to the comments of the BDEW we would like to highlight the following points: Remarks on section 2.1.: Balancing of complete portfolio can only be done if the necessary information is delivered by all grid operators. Therefore the proposed FG will have a very strong effect on the business of the TSO and of the DSO. On the level of the DSO – depending on the country – a very big number of companies have to implement all the rules into their IT systems and metering systems. Therefore it is important, that the DSO shall be actively included in the process of the preparation of the network code. The FG shall provide a level playing field for shippers of all sizes to access the market and supply customers in the different market segments. In Germany the implementation of the GABi Gas System has led to a country wide increase of suppliers to load profile costumers and small industrial customers. This is a very good basis for balancing rules and should be considered in the development. Remarks on section 6: From our understanding the FG should set the overlying rules for a long term balancing systems. The details of the frequency of information provision should be left to the development of the network code. The physical gas systems and the gas markets in the European countries differ very much. It should be evaluated whether shippers will profit of intraday updates of metering and load profile data compared to the occurring costs: • For load-profile customers using gas for cooking and warm water an intra-day update of the consumption with weather data is not sensible. • For load-profile customers using gas for heating purposes the experience in Germany has shown that the estimate of a load profile with newer temperature forecasts during the day does not achieve better estimates than using the weather forecast of the day before. The quality of the load profile estimate – compared to the real consumption of a customer - is driven mostly by the quality of the input data like yearly consumption, profile type, temperature station

	utilized. An intra-day recalculation and allocation of the consumption of load profile customers on the basis of intra-day physical gas flows in the DSO grids is very time consuming and expensive. In Germany for example thousands of daily-metered commercial and industrial customers are connected to the DSO-grids. Therefore the daily-metered customers would have to be read intra-day and then deducted from metered interconnection points to the TSO to recalculate the consumption of the load profile customers. The results of the German and the UK systems should be analyzed during the preparation of the Network Code. • For daily-metered customers the costs of metering increase considerably with the numbers of the readings. These costs have to be paid by the supplier of the customers.
PC-04-TOTAL-G	
PC-04-UNIDE-8	Paris, 9 June 2011 Subject: UNIDEN (member of IFIEC Europe) response to the ACER consultation on Framework Guidelines on Gas Balancing in Transmission Systems GENERAL REMARKS UNIDEN*, an association representing the largest gas industrial consumers in France, shares the ACER's view that the gas markets in Europe can still progress towards a unified and more competitive markets. Balancing is one of the issues which will have to be dealt with. We also share the view that the balancing regimes shall be based as much as possible on market mechanisms. The current draft of the "Framework Guidelines" should have the target to maximise competition throughout Europe by facilitating the establishment of competitive commercial positions by players regardless of their country of origin. This competition must be built not only by promoting the entry of new players (entrants) but also with new supply schemes such as direct access for industrial users to the wholesale gas markets (hubs and market places). In France, this new scheme has allowed industrial consumers to diversify their gas sourcing and thus take advantage of current low market prices against expensive long-term oil-indexed historical contracts. This has been an efficient way to promote competition in the market and to protect the competitiveness of our industrial production since the crisis of the end of 2008. Furthermore, the direct access of industrial consumers to the wholesale market has promoted competition also for industrial consumers who have maintained their classical sourcing schemes (i.e. site-gate delivery contracts), because of pressure on historical suppliers. In the "GRT Gaz" zones in France – mainly in the Northern zone, the most liquid one – the possibility for industrial consumers to have access to a relatively easy and cheap balancing has been the key element to support the development of competition in a market with low competition. In this context, the balancing rules are a key element for pursuance of this competitive trend. It is therefore essential that the Framework Guidelines provide necessary provisions that will ensure easy and cheap access to balancing for industrial consumers willing to access directly to the wholesale markets. * UNIDEN (http://www.uniden.fr/) represents the energy-consuming industries with operations in France. It includes 37 members, representing over 70% of the energy used by all French industries. It covers a wide range of industries including agribusiness, automotive, chemicals, cement and lime, electronics, ferrous and nonferrous metals, paper, transportation, and glass.
PC-04-UPRIG-F	
PC-04-VEGAJ-I	
PC-04-VERBU-L	Section 3: Buying and selling of flexible gas and balancing services by TSOs VERBUND comment: We believe that a balancing market should be established in

	the gas market based on a tender system by one counterparty organizing the auction.
PC-04-VOEGN-M	VOEG is the Free Trade Organisation for Electricity and Gas and is a representative organisation active in the Dutch gas and electricity market. We welcome the opportunity to comment on the draft FG produced by ACER. Whilst VOEG did not respond to the previous consultation by ERGEG, it has closely followed the FG development in the light of the recent introduction of the new balancing regime in the Netherlands. VOEG was an active player in the development of the new Dutch balancing regime. We see the new system as a major improvement, but unfortunately the market did not make the step to a daily balancing regime. We are delighted to see the introduction of a daily balancing regime in Europe via the FG. The current draft FG matches many of our views and believe this will boost the development of the EU gas market. VOEG supports the elements in the general provisions on the scope and objectives of the FG. We support the possibility for the NRA to allow interim steps such as balancing platforms in case there is insufficient market liquidity in the wholesale market, but only in the combination with the obligation of a plan (roadmap) for the full implementation of the guidelines, as is proposed. The annual NRA reporting requirement in Article 8 on the use of interim steps could be strengthened to ensure that TSOs move quickly towards the full target model. ACER should emphasise that all system users should be able to participate in balancing platforms and markets. This is currently not the case in the Dutch system. Therefore ACER should prevent the use of high minimum volumes for participation in balancing platforms, this hinders the liquidity. Direct access to these balancing mechanisms is important. Indirect access, via counter steering as is the case in the Netherlands should not be the only participation possibility for end-users. Realistic direct access possibilities should be implemented. We agree with the proposals in Article 3 on TSO procurement of flexible gas, including the TSO objective to minimise system balancing costs and to source gas primarily from the within-day market. The use of balancing platforms is appropriate as an interim measure. VOEG notes that the balancing service and flexible gas products (3.1) allows the TSO to procure flexible gas products of up to one year duration. This possibility should be retained in the text as it could be an efficient tool for the TSO in managing a daily balancing system in certain market areas, including the Netherlands. We believe that, in order for the TSO to balance the system at minimal costs, combining long term contracts and short term procurement from the wholesale market, intraday limitations are an essential tool for TSOs of some systems. These limitations, e.g. as used in France, ensure an equal daily flow into the system. The deficit between the base load intake and the varying hourly demand, purely the intraday shaping, should initially be supplied by the TSO via line pack, and long term flexibility contracts and to the lesser extent via the wholesale market. The required flexibility for intraday shaping can be forecasted and scheduled by the TSO, well in advance and is ideal for sourcing via long term contracts (annual). This also allows for the distinction between the flexibility for the intraday shaping and flexibility for imbalances, separating these markets. Intraday shaping should therefore be contracted via long term, volume neutral on the day, flexibility contracts. This results in the separation of intraday shaping costs and daily imbalance costs. This separation also allows for the correct allocation of the intraday shaping costs at the exit points. VOEG prefers this distinction to be made in the FG and ACER to limit and allocate the use of long term contract to the intraday shaping.
PC-04-WATER-A	

3If your comments exceed 3.500 characters, please provide your comments also in this area

Maximum length: 3500 characters

Editor	
PC-04-GL-GBiTS	
PC-04-ANIGA-S	
PC-04-BNEON-G	
PC-04-CENTR-V	
PC-04-CEPSA-G	
PC-04-CEPSA-O	
PC-04-DELRI-L	
PC-04-DONGE-N	
PC-04-ECONG-T	
PC-04-EDFEN-G	
PC-04-EDISO-H	
PC-04-EFETF-A	
PC-04-ENAGA-S	
PC-04-ENERG-I	
PC-04-ENIGA-V	
PC-04-EURBE-4	
PC-04-EXXON-M	
PC-04-GASBV-H	Please, see attached file.
PC-04-GASLI-D	
PC-04-GASNA-N	
PC-04-GDFSU-5	
PC-04-GEODE-5	(2) The experience with the German system (“allocated as nominated”) has led to a se-cure supply of households and has been a decisive cornerstone for more competition in the German gas market. GEODE strongly supports therefore the exception in para Section 6, para 6. The FG should therefore, at all costs, allow for certain flexibility for such system facili-tations, the details of which the national regulators could decide upon. (3) Requiring ENSOG to cooperate with the DSOs is considered a first very good step to ensure a better coordination between the TSOs and DSOs (para 5). Just for system-atically issues: The systematic position of this requirement is not quite fortunate. The position of the current para 5 should be moved to after para 6. GEODE considers, this coordination requirement should, however, not only concern the TSO information obligation provisions under Article 6, but be added as a general principle under Article 1. In so doing, the FG complies better with the legal basis in the gas regulation 715/2009. Regarding para 5 it should be clarified that the TSO will be required to find with the DSO joint solutions for the data transmission respectively for all sectors that actually and regally concern the TSO. Moreoever, it is also necessary to clarify who will de-cide on differing positions in case there is no mutual cooperation. We propose that the regulators should have the final decision in case of different opinions. III. Remarks to Section 3 GEODE welcomes Section 3.1 para. 1, according to which the TSOs should develop stan-dardised short-term and long-term balancing products. GEODE suggests explicitely adding, that the products and conditions must contribute to the market participation of smaller shippers and shipper-cooperations. Only different market players in a sufficient number garantees a real competitive trading market without oligopolis-tic structures

	IV. Remarks on Section 5 According to the draft, imbalance charges shall be based on the daily "marginal sell price or the marginal buy price"(cf. Section 5.1. para. 5 in conjunction with Article 1.4) and borne by those shippers who where out of balance. In this respect, GEODE is calling for a clarification that is not possible to trace back and allo-cated the entire daily aggregate system costs to the individual difference portfolios of individ-ual shippers. Thus, particularly smaller portfolio traders will be disadvantaged since they do not have the same portfolio diversification as the large portfolios of established traders. Furthermore, the formation of imbalance charges should be based upon the average monthly prices for the procurement of TSO balancing energy. Otherwise the cost-allocation will be accidental, because in many cases the actual costs are incurred with a considerable delay or even a few days before. V. Remarks on Section 1 and 2 Regarding the offering of the linepack in TSO and DSO-networks (only) by the TSOs, it must be clarified, that the DSOs must be compensated by the TSOs or must be able to sell their linepack directly to the shippers. VI. Remarks on Section 8 The implementation period of 12 months is too short, since the necessary system and IT de-velopments may just be contracted after all details have been finally clarified and become legally binding. In view of the year 2015, such a short implementation period is not required.
PC-04-GOTTJ-L	
PC-04-IFIEU-D	
PC-04-INITI-G	
PC-04-INTER-07	
PC-04-JPMCH-9	We are writing in response to the above and are pleased to have this opportunity to share J.P. Morgan's views with you on the proposals raised in this consultation paper. J.P. Morgan has been consistently supportive of efforts to improve the efficiency and transparency of energy markets, both within Europe and internationally. We welcome the role the Agency for the Cooperation of Energy Regulators (ACER) will play in removing technical obstacles to efficient cross-border energy trade and coordinating activities across Member States with the aim of establishing a single European energy market by 2014. We believe these framework guidelines mark an important first step towards reaching full implementation of a market-based common balancing regime. We agree in principle with the scope of the proposals and the objective they seek to achieve. More specifically, we: • support, as a general matter, the policy objectives of promoting transparency with the aim of stimulating liquidity and fair, competitive markets and thus welcome the requirement that Transmission System Operators (TSOs) will provide network users with regular, aggregate input and off-take information along with TSO buying and selling activities. We suggest the network code specifies that the TSOs must provide information on a frequency which correlates to the balancing requirements of the market, to ensure shippers have the ability to balance their portfolios, rather than prescribe a minimum frequency; • welcome the network code specifying that TSOs will publish transparent methodologies for the calculation of imbalance charges; • firmly endorse harmonised balancing periods across the EU; • welcome measures which are designed to increase liquidity; • support harmonisation and shorter response times under nomination procedures; and • concur with the principle that, to the extent possible, network users should be incentivised to balance their portfolios but with the rules providing for TSOs to balance if necessary in extremis.

	We would also highlight to ACER the importance of the subsequent network code being sufficiently prescriptive to ensure harmonisation between Member States is achieved; we are concerned that an inadequately detailed network code provides scope for the continuance of divergent practices across the EU, which would run counter to the single European market policy objective. Particularly, we regard strict convergence in the following areas as key to reaching a harmonised gas balancing regime: • harmonised nomination procedures at both sides of the border at interconnection points; and • use of standardised products across Member States. We believe it is essential that the network code requires, as ACER proposes, TSOs to "coordinate the product range with neighbouring markets". We would welcome the opportunity to discuss this topic and others relating to the development of a single European energy market further with you. Yours sincerely Etienne Amic Managing Director Head of EMEA Energy Trading & Sales, and Principal Investments
PC-04-LOUDM-T	
PC-04-MOQAE-S	
PC-04-NATUR-D	
PC-04-NATUR-U	Balancing period • In our point of view, obligations for network users to match individual inputs and off-takes on an hourly basis should be avoided. Moreover, where within-day obligations are deemed unavoidable they should preferably take the form of incentives designed to reward network users for flowing gas in a particular manner rather than penalties for not. • The network code on gas balancing shall prohibit certain within-day obligations which would pose undue barriers on new entry into the European gas markets or on cross-border trade. In this way, moreover the matters considerate by ACER, in our opinion these should include the restriction of re-nominations and the introduction of related penalties applied only to certain entry/exit points. Imbalanced charge • When costs incurred by TSOs from undertaking balancing activities are not directly attributable to a network user, may be shared across all network users or considerate in the System´s regulated settlement process, for example in the Spanish gas system. • Regarding the imbalance charge based on a administered price or proxy, it should always be representative for the market, in order to avoid distortions. Obligations on information provision • The availability of adequate information for balancing activities is essential and thus we agree that information should be published by TSOs in a clear and timely manner. Moreover, in our opinion this information should be available before the application of the new balancing rules, ensuring its good quality. In this way, we agree with ACER that it is very important the coordination between TSOs and DSOs in order to give shippers an appropriate information. • Regarding the information, network code shall require TSOs to establish a transparent, public and adequate methodology to provide that information (parameters, calculation, criteria's, etc)

	• On the other hand, and with respect to the costs involved in the development of the necessary information systems for the publication of information, data should be carefully analysed in order to ensure that only the necessary information is made available. Cross-border cooperation • We consider that balancing zones should be organised in a systemic point of view and not constrained by national borders. Thus, we also agree that TSO's should be encouraged to cooperate in order to develop cross-border balancing zones with common rules.
PC-04-NGRID-G	
PC-04-NIGES-G	
PC-04-NITSC-Q	
PC-04-OGPBE-L	
PC-04-OPENG-G	
PC-04-OSULB-P	Gaslink would like a number of clarifications in respect of the proposed Condition 3.1 text. As per this condition 'TSOs to maximise the amount of their gas balancing needs to be fulfilled through the buying and selling of short-term standardised products on the wholesale market'. Given this requirement, who is responsible for providing access to a liquid short-term wholesale market? Also, this condition does not stipulate that this wholesale market must be located within the same country as the TSO. Therefore, Gaslink seeks clarification as to whether the wholesale market must be confined by domestic borders in respect of the entire Framework Guideline. As mentioned earlier, the Irish market has access to a neighbouring liquid wholesale market in Great Britain and we consider that this meets the Framework Guideline requirements. We seek clarification on whether this access would meet the requirements of the balancing framework guidelines. Gaslink has serious concerns relating to Condition 4.2 of the Balancing framework guidelines, specifically the requirement that 'the network code on gas balancing shall prevent TSOs from requiring that network users nominate input volumes which match their output volumes'. This requirement will prevent Irish network users from maintaining a Zero Imbalance Position 'ZIP'. All Irish network users are required to maintain ZIP, which requires each network user to ensure that nominations and renominations submitted by such network users' achieve and/or maintain a zero imbalance position. Maintaining ZIP is a discipline which ensures the safe operation of the gas transportation system, results in fewer balancing actions for the system and encourages network users to balance their portfolios. Gaslink urges ACER to reconsider the proposed text in relation to this matter.
PC-04-PEAAN-Y	
PC-04-POWEO-Q	
PC-04-RANGB-W	
PC-04-RWEST-G	
PC-04-SEDIG-A	
PC-04-SEDIG-U	
PC-04-SHELL-S	
PC-04-SORGE-6	We agree with the adoption of stand-alone balancing platforms in systems characterized by less mature wholesale markets and high level of market concentration. We recommend the introduction, on a national basis, of an obligation for network users to offer all their available balancing resources on this platform, in order to ensure an adequate level of liquidity. An optional participation could be implemented only when wholesale markets will reach a

	mature stage. The progressive elimination of balancing platforms requires a constant monitoring on wholesale markets, in order to best evaluate the possibility of TSOs participation on wholesale markets for balancing purposes. Sorgenia agrees with the implementation of an harmonised balancing period and the adoption of a daily balancing regime. We do not support the imposition of within-day constraints on network users. We believe that the imposition of administered charges in case of failing to meet within-day obligations, is not a cost-reflective measure and could be excessively burdensome for network users operating in less mature markets. We believe in fact that implementing a market-based balancing system represents itself an incentive for network users to take appropriate balancing actions during the day. With reference to renomination schedules, we recommend the necessity of exploiting the synergies existing between power and gas markets and the flexibility resources present on both markets. We believe that it is of primary importance the cost-reflectivity of imbalance charges. However that, at a starting stage of the network code implementation, imbalance charges shall be set without any penalization/incentive. With particular reference to the Italian case, such a kind of provision could give inefficient results, due to a scarce off-takes predictability which derives from insufficient measure data together with an inefficient load-profiling methodology. As regards the valorisation of imbalances on the balancing platform, we suggest that imbalance charges shall be based on a proxy for a market price, because of possible distortions deriving from the implementation of administered prices. We moreover suggest the introduction of an option for NRAs to transitionally define a cap on imbalance charges in order to avoid excessive volatility in imbalance charges and the related system costs. We appreciate the provision of obligations for TSOs to provide clear and well-timed information to network users. We believe that this information shall be even sufficient, accurate and reliable for all operators. Moreover, we highlight the importance to introduce information provision obligations not only for TSOs but even for DSOs, with particular reference to the availability of both DM points data (with an hourly update of big industrial final customers and power plants consumption data) and the technical information needed for the settlement of NDM points. With regard to this, we recommend the implementation of mechanisms giving more responsibilities to DSOs and TSOs with respect to the fulfilment of their information obligations and on data exchanges. Finally, as regards the possible implementation of guarantee mechanisms by NRAs, the Network Code shall define general provisions for the implementation of non-discriminatory and not too burdensome guarantee mechanisms, in order to avoid the formation of obstacles for small operators as well as barriers to entry for new comers.
PC-04-SSEUK-K	
PC-04-STECK-X	
PC-04-STEKA-T	
PC-04-SYKCH-Q	
PC-04-THUGA-V	
PC-04-TOTAL-G	
PC-04-UNIDE-8	FLEXIBILITY SOURCES FOR BALANCING UNIDEN agree with ACER that the network users must have the primary responsibility for balancing their own portfolio. But for a long time, flat industrial profiles have been contributing to the balance of the network. Therefore, industrial consumers (and especially those that manage their shipping and balancing independently) that are able to keep their balancing portfolio within an acceptable tolerance (linepack) should be incentivised by the TSOs. If specific services are provided by the TSOs, it is important that these specific costs are allocated to the concerned shippers

	These extra costs and rules of balancing could be defined in order not to break the new competitive ways of sourcing gas and to protect the competitiveness of our industrial activity. Furthermore, UNIDEN would like to highlight that a market based balancing regime requires a 24/7 open and also a liquid market place. Any new entrants (including industrial users acting as shippers) who do not have the ability to trade on a liquid hub would be more exposed to potential imbalance charges. TSO INFORMATION PROVISION OBLIGATIONS UNIDEN supports that the TSOs publish regular information in order to enable shippers to take necessary actions to correct their imbalances. Every shipper shall be responsible for its own position regardless of the global position of the network (short vs. long). This would prevent shippers from moving in the direction of the overall system balance, which would avoid big "yo-yo" effect movements. PREREQUISITES FOR AN INTEGRATE COMPETITIVE MARKET The merger of balancing zones (first in internal and then in cross-border balancing zones) is the first priority to promote competition and create the single European market. The criteria of a liquid market open 24/7 should be defined clearly: transparent, measurable and quantifiable criteria both on the day-ahead, intra-day and forward market. The interim period would be maintained by NRAs as long as these criteria are not met. Claire BERTRAND President of Oil & Gas Commission UNIDEN Tel.: + 33 1 53 56 61 41 Mobile: +33 6 07 15 51 15 Fax: + 33 1 53 56 61 10 Email: claire.bertrand@eu.rhodia.com
PC-04-UPRIG-F	
PC-04-VEGAJ-I	
PC-04-VERBU-L	
PC-04-VOEGN-M	In order to create a European wide balancing system, VOEG believes ACER should in consultation with market participants give further guidance to ENTSOG on the within day limitations. Variations in the within day limitation between networks can easily lead to a lack of harmonisation and prevent integration. Where it can minimise costs, the TSO should be allowed and obliged to purchase balancing volumes in the wholesale market of the neighbouring network, if the transportation capacity is available. TSO should have an obligation to support purchases of other TSO's on their market for balancing reasons. VOEG strongly supports the target model of daily balancing with an end of day cash out. A thorough cost benefit analysis must be applied to the use of within-day obligations taking into account the impact on all market participants. ACER must ensure that the wording designed to prevent TSOs from applying charges for hourly imbalances is robust and prevents any loopholes. We believe it is important to maintain the cash out at the end of the day as a real financial transaction and a reset of the imbalance volume. Any other solution (cumulative balancing) will be at the cost of the liquidity of the intraday gas market

	VOEG is of the opinion that a daily balancing system could and can be implemented in the Netherlands. In our opinion the daily balancing regime is an improvement for the market and a stimulant for the development of the intraday gas markets. The current cumulative system is settled on a daily basis, and can run, without a cash out for a longer period. This does not give any incentive for users to buy and sell volumes to decrease the imbalance. The interference of the TSO artificially steers the bid ladder calls to 30 calls a month, during the summer period, creating an artificially, TSO triggered cash out. The daily settlement and daily balancing regime will be an improvement for the development of the market liquidity. We support the proposed wording on TSO information provision, but believe the frequency of the information is not sufficient for the adequate balancing of the portfolio. The Dutch experience is a good example how transparency can be improved for balancing purposes and delivered on a near-real time basis. This is the preferred situation: near real time steering information and balancing information within a daily regime. The minimum information requirement should be changed to every 4 hours, instead of twice a day and ACER could add some wording to the FG to include a preferred situation. From the experience of the current system in The Netherlands, VOEG is not of the opinion that the aggregated information on the system position provides the potential for abuse by network users and would prefer the potential for the TSO to be exempted from publication to be deleted. In the 2 year development process of the new balancing regime in the Dutch market, VOEG has gain a lot of experience. If ACER is interested we are more than willing to meet and discuss these experiences and views. Please feel free to contact us if you have any questions on our positions or views.
PC-04-WATER-A	

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