

ENTSOG response to ACER Public Consultation on the Oil & Gas UK proposal to amend the Gas Network Codes CAM and BAL in order to retain the UK Gas Day

The Agency invites all interested parties to reply to the following consultation questions:

1. Respondent's name & contact details, name & type of organisation or stakeholder.
2. Please provide a short description of your interest, motivation & role in this amendment proposal.
3. Do you support, oppose, or have a neutral position towards the proposed amendment being further considered by ACER? Please specify the main reasons why you think ACER should or should not pursue this amendment request.

Please send your comments and replies to a1_2014@acer.europa.eu **by 9 February 2015, 12.00 noon, Central European Time**. The stakeholder responses will be published on the Agency's website. If you share commercially sensitive information, please also provide a non-confidential version for publication purposes.

DRAFT ENTSOG RESPONSE FOR CAP WG FINALISATION WEDNESDAY 20 JANUARY

1. *ENTSOG AISBL; Av. de Cortenbergh 100, 1000-Brussels; [REDACTED]*
2. *The role of ENTSOG (the European Network of Transmission System Operators for Gas) is to facilitate and enhance cooperation between national gas transmission system operators (TSOs) across Europe in order to ensure the development of a pan-European transmission system in line with European Union energy goals. ENTSOG tasks are defined within European Gas Regulation (EC) 715/2009 and include developing Network codes. The network codes developed by ENTSOG set out the rules for gas market integration and system operation and development, covering subjects such as capacity allocation and balancing.*
3. *ENTSOG supports the alignment of the EU gas day as defined in CAM and therefore opposes the amendment proposed by Oil and Gas UK.*

Main reasoning:

As prescribed in the CAM Regulation¹ and for some considerable time now; TSOs have been planning for the introduction of the CAM and Balancing Codes on the basis that the gas day in Great Britain, Northern Ireland and the Republic of Ireland, together with the rest of the European market, will be aligned. ENTSOG relevant member TSOs have full plans to make the appropriate changes to align the gas day² to 5:00 to 5:00 UTC. ENTSOG understands that appropriate solutions to handle this change have been found in the relevant member states.

Amongst other issues, ENTSOG believes that there are likely to be difficulties in the introduction and operation of bundled products at interconnection points if the bundled capacity acquired at either side of an interconnection point is for misaligned gas days. ENTSOG believes that the appropriate way forward is to continue with the current CAM and Balancing Regulation obligation, namely that the gas day should be aligned within EU from October 2015³.

In addition at this late stage there would also be considerable difficulties for relevant TSOs in revising the work they have already undertaken in respect of the introduction of the CAM and Balancing Codes. If there were a change to the current harmonised European gas day, this could well lead to obstacles for TSOs in meeting the 2015 implementation date and may also have unintended consequences to the overall implementation activities if this were to change at such a late stage. Finally, the goal of the Network Code is to harmonise European processes.

¹ COMMISSION REGULATION (EU) No 984/2013 of 14 October 2013 establishing a Network Code on Capacity Allocation Mechanisms in Gas Transmission Systems and supplementing Regulation (EC) No 715/2009 of the European Parliament and of the Council.

² CAM Regulation article 3.7: 'gas day' means the period from 5:00 to 5:00 UTC the following day for winter time and from 4:00 to 4:00 UTC the following day when daylight saving is applied.

³ The Gas Day is defined in the CAM Regulation which is applicable from 1st November 2015. The Balancing Regulation refers to the Gas Day definition in the CAM Regulation and is applicable from 1st October 2015 therefore, for the purpose of the Balancing Regulation, the definition of "gas day" is applicable as well as from 1st October 2015.