

[GAS Network Codes Functionality Platform](#)

**REPORTED ISSUE ID: 02/2020. Dutch
TSO requirement of message
PRODOC is unnecessary and contrary
to Network Code on Gas Balancing of
Transmission**

Reported by: EASEE-gas
Status: CLOSED

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ISSUE DETAILS

ABSTRACT

The Dutch TSO Gasunie Transport Services (GTS) is today forcing its market players to send a message called PRODOC (LoadForecast_Document) in its first version before 13.00 day ahead. This message must be balanced at a point where no Balance Responsible Party (BRP) is balanced (since trading is an ongoing activity). As a result of this many BRP's create non planned volumes to be able to get their message balanced and approved by GTS and they have to implement these additional messages if they want to take part in the Dutch wholesale market. GTS then responds with a PROCON (LoadForecast_Confirmation) that tells if the program is approved. We do not see which value this message gives to GTS since the same information can be extracted from existing nomination and balancing process. We also notice this process breaches part of the network code on Gas Balancing of Transmission Networks.

Category: National

REPORTED ISSUE

The Dutch TSO Gasunie Transport Services (GTS) is today forcing its market players to send a message called PRODOC (LoadForecast_Document) in its first version before 13.00 day ahead. This message must be balanced at a point where no Balance Responsible Party (BRP) is balanced (since trading is an ongoing activity). As a result of this many BRP's create non planned volumes to be able to get their message balanced and approved by GTS and they have to implement these additional messages if they want to take part in the Dutch wholesale market. GTS then responds with a PROCON (LoadForecast_Confirmation) that tells if the program is approved.

We do not see which value this message gives GTS since the same information can be extracted from existing nomination and balancing process where BRP's send their current planned activity for day ahead but on a detailed level with real values.

We also notice this process breaches the following part of the network code on Gas Balancing of Transmission Networks:

Page 1 (Against harmonisation and specific process only valid in the Netherlands):

(2) In order to move towards greater market integration, it is important that rules on gas balancing of transmission networks facilitate gas trading across balancing zones thus contributing towards the development of market liquidity. This Regulation therefore sets out harmonized Union-wide rules on balancing which have the objective to give network users the certainty that they can manage their balance positions in different balancing zones throughout the Union in an economically efficient and non-discriminative manner.

Page 3 Article 4 (since they will have more accurate information in the nomination)

2. Balancing rules established in accordance with this Regulation shall reflect genuine system needs, taking into account the resources available to transmission system operators and shall provide incentives for network users to balance their balancing portfolios efficiently.

Page 12 Article 12 (Since this must be balanced and is in addition to the real nomination it is not accurate).

2. The transmission system operator may require network users to provide further information on nominations and renominations in addition to the requirements set out in this Regulation, including, inter alia, an accurate, updated and sufficiently detailed forecast of the expected inputs and off-takes, this in accordance with the specific need(s) of the transmission system operator.

CONCERNED ENTITIES

Network Code / Guidelines concerned:

Network Code on Gas Balancing of Transmission Networks, Commission Regulation (EU) 2014/312

Member State(s) concerned:

- Netherlands

IP(s) concerned:

None selected

NOTIFIED PARTIES

Informed NRA(s):

None selected

Informed TSO(s):

- Gasunie Transport Services B.V. (NL)

SUGGESTED ACTIONS

Who should act:

- ACER
- ENTSOG
- INVOLVED_NRAS
- INVOLVED_TSOS

Suggested solution or action:

- Adjustment of implementation

SOLUTION

In the process of validating, categorising, and prioritising the issue, ACER and ENTSOG have determined that the issue is of a national nature.

The issue will therefore be closed on the FUNC Platform without being further processed.

For further details, reference is made to the Issue Solution Note below.

Solution publication date: 2021-05-12

DOCUMENTS

[SOLUTION - Issue Solution Note](#)

Gas Network Codes Functionality Process Issue Solution

Issue details	
Number:	02/2020
Name:	Dutch TSO requirement of message PRODOC is unnecessary and contrary to Network Code on Gas Balancing of Transmission
Reporting party:	EASEE-gas
Network Code / Guidelines concerned:	Commission Regulation (EU) No 312/2014 of 26 March 2014 establishing a Network Code on Gas Balancing of Transmission Networks
Article of the Network Code / Guidelines	Article 4, Article 12
Category:	National
Abstract:	
<i>The Dutch TSO Gasunie Transport Services (GTS) is today forcing its market players to send a message called PRODOC (LoadForecast_Document) in its first version before 13.00 day ahead. This message must be balanced at a point where no Balance Responsible Party (BRP) is balanced (since trading is an ongoing activity). Because of this, many BRPs create non-planned volumes to be able to get their message balanced and approved by GTS and they have to implement these additional messages if they want to take part in the Dutch wholesale market. GTS then responds with a PROCON (LoadForecast_Confirmation) that tells if the program is approved. We do not see which value this message gives to GTS since the same information can be extracted from existing nomination and balancing process. We also notice this process breaches part of the network code on Gas Balancing of Transmission Networks.</i>	

Issue solution(s)	
Publication date:	12 05 2021
In the process of validating, categorising, and prioritising the issue, ACER and ENTSG have determined that the issue is of a national nature.	

The main principle of categorization is that the respective national regulatory authority (NRA) and TSOs shall handle issues, which can be solved nationally, in accordance with the subsidiarity principle. In case an issue that is posted as national reaches a regional, cross-border or European scale, the issue can be progressed in the Functionality process.

In their initial discussions with the concerned NRA and the TSO, ACER and ENTSOG have been made aware that the review of the Dutch Energy Act is pending, and it foresees to put an end to the PRODOC requirement in the future. Despite that, the Energy Act may only be adopted after the new elections in the Netherlands. Since the changes in the national law remain a precondition to solve this issue and since the preparatory work for the legislative changes are ready, ACER and ENTSOG propose that the issue be solved at the national level.

The issue will therefore be closed on the FUNC Platform without being further processed. The concerned NRA and TSO have been informed and are aware of the issue.