



GAS Network Codes Functionality Platform

REPORTED ISSUE ID: 11/2018. Inconsistencies in the publication of reserve price information prior to the annual yearly capacity auctions

Reported by: EFET Status: SOLVED

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ISSUE DETAILS

ABSTRACT

In order to form capacity booking strategies and facilitate efficient portfolio management traders need to know, with certainty, what reserve prices will apply for at least the forthcoming gas year before the yearly capacity auctions, along with any multipliers and seasonal factors for short term capacity products. To the extent such information is not provided, or provided inconsistently, traders face unmanageable price risk and may flow gas sub-optimally, which creates market inefficiency. A review of the information published prior to the most recent yearly capacity auctions will serve to improve the completeness and consistency of data published in future years.

Category: European

REPORTED ISSUE

The TAR NC requires TSOs or NRAs to publish "the reserve prices applicable until at least the end of the gas year beginning after the annual yearly capacity auction" for firm and interruptible capacity at IPs. Multipliers and seasonal factors applied to non-yearly standard prices (along with their justification) and an assessment of the probability of interruption (including an explanation of how this probability is calculated and the historical or forecast data used to estimate it) must also be published at the same time. Publication shall be via a link on the ENTSOG Transparency Platform in a clear, easily accessible, downloadable format, to the extent possible in English, no later than 30 days before the annual yearly capacity auction.

The annual yearly capacity auctions for Gas Year 2018 took place on 2nd July 2018 and EFET observed a number of inconsistencies in terms of how the above requirements were applied (examples are included in the non-exhaustive review of each Member State in the supporting document no. 1). A number of TSOs/NRAs:

- did not appear to publish reserve prices applicable until at least the end of the gas year beginning after the annual yearly capacity auction,
- indicated that reserve prices would be the same as those that currently applied except for inflation, which would be known later in the year,
- published separate prices for quarterly elements of the gas year (e.g. Q418 and Q1-Q3 19) whereas others published a weighted average price for the gas year based on these quarterly elements,
- did not provide justification for multipliers and/or seasonal factors and/or an explanation of how the probability of interruption is calculated,
- did not provide the information via the link on the ENTSOG Transparency Platform,
- did not provide some or all of the required information in English.

CONCERNED ENTITIES

Network Code / Guidelines concerned:

Network Code on Harmonised Transmission Tariff Structures for Gas, Commission Regulation (EU) 2017/460

Member State(s) concerned:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Northern Ireland
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom

IP(s) concerned:

None selected

NOTIFIED PARTIES

Informed NRA(s):

None selected

Informed TSO(s):

None selected

SUGGESTED ACTIONS

Who should act:

- ACER
- ENTSOG
- INVOLVED_NRAS
- INVOLVED_TSOS

OTHER

Suggested solution or action:

 Other (acer and entsog should undertake their own review of the information provided under article 29.)

Other suggestions: ACER and ENTSOG should undertake their own review of the information provided under Article 29. In conjunction with stakeholders, they should develop guidelines about how such information is interpreted and a standard template for how such information is published. NRAs and TSOs should then adopt these when publishing information prior to the next yearly capacity auctions in July 2019.

SOLUTION

ACER and ENTSOG have checked the status of the publication requirements under Article 29 for 2018, for each TSO/NRA.

Following this review, ACER and ENTSOG have completed a series of recommendations for NRAs and TSOs to follow in the publication of the requirements under Article 29 for the July 2019 auction. These recommendations aim to improve the implementation of publication requirements pursuant to Article 29.

ACER will check the Article 29 information published for the July 2019 auction and the extent to which it is in accordance with these recommendations. An overview of the findings will be published on FUNC platform by the end of September.

Solution publication date: 2019-06-04

DOCUMENTS

ISSUE SUPPORTING - Inconsistences in publication of reserve price information

SOLUTION - Solution Supporting Document

SOLUTION - Issue Solution Note

			Article 29
Member State	Party Responsible for publishing	Link	Notes*
Austria	E-Control - GCA	<u>Link</u> Link	Information only seems to be available in German and for the Calendar Year 2018
Belgium	E-Control - TAG Fluxys	LINK	Information only seems to be available in German and for the Calendar Year 2018 Information only available for Calendar Year 2018. Tariffs for Calendar Year 2019 still subject to indexation which won't
Beigium	liuxys	Link	be known until Nov 18
Bulgaria	Bulgartransgaz		Firm and interruptible prices available for Gas Year 2018 but justification of multipliers only in Bulgarian and no
		<u>Link</u>	assessment of probability of interruption.
Croatia	HERA ERO	Link	Information only seems to be available in Croatian and for the Calendar Year 2018 Only available in Czech but firm and interruptible (ex-post) prices available for Calendar Years 2018 and 2019 along with
Czech Republic	ERO	Link	multipliers. No assessment on the probability of interruption
Denmark	Energinet		Firm and interruptible prices available for Gas Year 2018 along with multipliers (no justification). No assessment of
	ŭ	Link	probability of interruption.
Estonia	Elering	Link	Information seems to be available for year July 2018 but Estonia still have a derogation from TAR NC until 2020
France	GRT Gaz	Link	Information only available for year April 2018 with prices for Q2 and Q3 2019 being indexed to inflation index published in April 2019. No justification for multipliers or probability of interruption.
	Terega	LIIIK	Information only available for year April 2018 with prices for Q2 and Q3 2019 being indexed to inflation index published
	1-1-92	Link	in April 2019. No justification for multipliers or probability of interruption.
Finland	Gasum/Energy Authority	N/A	Derogation until 2020
Germany	Bayernets	<u>Link</u>	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Elwara Dautashland	Link	probability of interruption (methodologies in German - BEATE) Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Fluxys Deutschland	LINK	probability of interruption (methodologies in German - BEATE)
	Fluxys TENP	Link	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
			probability of interruption (methodologies in German - BEATE)
	Gascade	<u>Link</u>	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	GTG Nord	Link	probability of interruption (methodologies in German - BEATE) Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	G I G Nord	LINK	probability of interruption (methodologies in German - BEATE). Link on ENTSOG TP does not show 2019 prices, but
			these are available elsewher
	Gasunie Deutschland	Link 1	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
			probability of interruption (methodolgies in German - BEATE). Cal 2019 tariff data published as a statement (see 2nd
		Link 2	link)
	GRT Gaz Deutschland	<u>Link</u>	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Jordgas	Link	probability of interruption (methodologies in German - BEATE) Link on ENTSOG TP shows information only for Calendar Year 2018 but Calendar Year 2019 data is available via OGE.
	Jordgas	LIIIK	Link on ENTSOG TP takes you to Article 30 data not prices
	Lubmin-Brandov	Link	Information only seems to be available for the Calendar Year 2018
	NEL	Link	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Name		probability of interruption (methodologies in German - BEATE)
	Nowega	Link	Firm and interruptible prices available for Calendar Year 2018 seem to have been removed from the website but preliminary Calendar Year 2019 prices are available (in German only). Justification for multipliers and explanation of
			probability of interruption (methodologies in German - BEATE)
	Ontras	Link	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
			probability of interruption (methodologies in German - BEATE)
	OPAL	<u>Link</u>	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Open Grid Europe	Link	probability of interruption (methodologies in German - BEATE) Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Open Glid Ediope	LIIIK	probability of interruption (methodologies in German - BEATE). Tariff for Gas Year 2018 is a weighted average of 2018
			and 2019 tariffs
	Terranets	<u>Link</u>	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with untipliers but only available in
	Thusangas	Link	German. Explanation of probability of interruption (methodologies in German - BEATE) Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and explanation of
	Thyssengas	LIIIK	probability of interruption (in German - BEATE)
Greece	DEFSA	Link	Information only seems to be available for the Calendar Year 2018 with coefficients being updated in May 2018
Hungary	FGSZ	Link	Information only available in Hungarian on the Government website. ENTSOG TP link shows only Article 30 data
Ireland	Gas Networks Ireland		Information now available for Gas Year 2018 but don't think this was available at the time of the July 18 annual capacity
lant.	Coor Data Coo	Link	auctions Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers and probability of
Italy	Snam Rete Gas	Link	interruption. ENTSOG TP link does not take you to the 2019 prices
Latvia	Conexus	Link	Information only seems to be available for the year From July 2017
Lithuania	Amber Grid	Link	Information only seems to be available for the Calendar Year 2018
Luxembourg	CREOS/ILA	N/A	Derogation
Netherlands	GTS	Link	Firm prices available for Calendar Year 2018 and 2019 along with multipliers. Interruptible price methodology not
	BBL	LINK	immedialtely obvious (TSC Appendix 7) and justification of probability of interruption appears to be missing Firm and interruptible prices available for Gas Year 2018 along with multipliers. No justification of probability of
	BBE	Link	interruption
Poland	Gaz System	Link	Firm and interruptible prices available for Gas Year 2018 along with deemed multipliers for national transmission system.
			No justification of probability of interruption as ex-post applied. Transit prices fixed through to 31/12/19
Portugal	ERSE	<u>Link</u>	Firm and interruptible prices available for Gas Year 2018 and 2019 along with multipliers. Probability of interruption
Romania	Transgaz		infintesimal so ex-post discounts now applied (pro rated on basis of actual capacity and duration of interruption) Firm and interruptible prices available for Gas Year 2018 along with multipliers. Ex-post discounts applied with no
Nomania	Transgaz	Link	justification
Slovakia	Eustream		Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers (justification to follow once
		Link	consultation is completed). Ex post interruptible discounts apply as no "real" experience of interruptions
Slovenia	Plinovodi	l	Firm and interruptible prices available for Calendar Year 2018 and 2019 along with multipliers. Justification of multiplierd
		100000	
Spain	Engage	<u>Link</u>	and probability of interruption to be provided following consultation
Spain Sweden	Enagas Swedenas	Link	Information only seems to be available for the Calendar Year 2018.
Spain Sweden	Enagas Swedegas		
		Link	Information only seems to be available for the Calendar Year 2018. Dragor is not subject to booking procedures so it does not constitute an IP under CAM, hence Article 29 does not apply.

^{*} E&OE

		User friendly Art. 31.1.a		Clear and easily accessible Art. 31.1.b	Downloadable format Art. 31.1.c	English Art. 31.1.d.	Units Art. 10 CAM NC	Art. 29.a.i.	Firm products, mult Art. 29.a.ii.	cipliers, seasonal factors Art. 29.a.iii.	Art. 29.a.iv.	Art. 29.b.i.	inter Art. 29.b.ii.1.	erruptible capacity Art. 29.b.ii.2.	Art. 29.b.ii.3.	
		AIL. 31.1.a		Art. 31.1.D	Art. SI.I.C	AIL SI.I.u.	AIT. 10 CAWING	Alt. 25.d.i.	AIL 25.d.II.	AIL 25.d.III.		Art. 25.0.1.	Art. 25.D.II.1.	Art. 29.0.11.2.	AI t. 25.0.II.3.	
Country T:	60	Are links working?	Is the information structured following the sub-points of Art. 29	Does the NRA/TSO website include a + reference to Article 29 where the relevant	nt Single downloadable pdf/excel file?	Available in English?	Is capacity expressed in KWh/h or KWh/d units?	Are reserve prices applicable until end of gas year?	Are the applicable multipliers and seasonal factors	Has a justification for multipliers been provided? (We expect that the full justification for the level of multipliers focusing on the	the application of seasonal factors focusing on the	Are reserve prices applicable until end of gas year?	· ·		f Is the historical/forecasted data used to estimate probability	Link to NRA/TSO website
		Do links lead to the relevant information?	ENTSOG's template?	information can be found?	emple de aminedada de par, excer mer		is copacity expressed in the syntax and synt	The reserve private approache and on Sub years	provided? Are they within the foreseen thresholds?	criteria in Art. 28.3.a was published in the consultation on Art. 28. This consultation has not been checked as part of this analysis)	· · · · · · · · · · · · · · · · · · ·	The reserve private apprivation and or gas years	applied been provided?	interruption been provided?	of interruption included?	
Austria TRANS GASLE		Yes	Yes	Yes	Yes	Yes	kWh/h	Yes. However it is not easy to determine the period for which	Yes	No. The current approach dates back to a decision taken prior to the entry into force of the TAR NC, i.e. the current multipliers are applicable for the current tariff period (2017-2020) and were	Not applicable	Yes. However it is not easy to determine the period for	Yes. Ex-post discounts applicable 2017-2020. A final consultation with an approach compliant with the NC		Yes. Ex-post discounts applicable.	https://www.e-control.at/en/marktteilnehmer/gas/tarif-network-code
Austria Gas conne	ect Austria	Yes	Yes	Yes	Yes	Yes	kWh/h	tariffs are applicable. See comments (right column).	Yes	adopted in 2016. Although a consultation according to Art. 28 has already taken place, the final consultation with the justification for the level of multipliers will be consulted in Q4 2019.	Not applicable	which tariffs are applicable. See comments (right column).	TAR on interruptible capacity will be launched in Q4 2019	‡ Tes. Ex-post discounts applicable.	res. ex-post discounts applicable.	
																https://www.e-control.at/en/marktteilnehmer/gas/tarif-network-code
Czech Republic Net	1gas	Yes	Yes	Yes	Yes	English version available only as of 2/09/2019	kWh/d	Yes	Yes	Yes, but this information was provided in English only as of 2/09/2019	Seasonal factors not applied, but this information was provided in English only as of 2/09/2019	Yes	Yes	Yes. Ex-post discounts applicable, but this information was provided in English only as of 2/09/2019	Yes	https://www.eru.cz/en/-/zverejneni-informaci-uvedenych-v-clanku-29-nc
France GRT	gas	Yes	Yes	Yes	Yes	Not all the information. Link to the NRA deliberation in French	MWh/d	Yes. According to the website tariffs for 1/4/20 to 30/9/20 wi be maintained at the current level.	an IP is congested or not but it is not clear from the summary information what congestion means .	No. The NRA will include the multipliers justification topic in the July public consultation and this justification will be published in November 2019 in the new tariff ATRT7	Only applied at domestic points.	Yes According to the website tariffs for 1/4/20 to 30/9/20 will be maintained at the current level.	Yes	Yes	Yes	http://www.grtgaz.com/en/the-advantages-of-natural-gas/the-french-natural-gas-market/regulatory-framework/publication-according-to-network-code-tariff-tar-nc.html
						Not all the information. Link to the NRA	^	Yes. According to the website tariffs for 1/4/20 to 30/9/20 wi	Yes. Different multipliers apply depending on whether	No. The NRA will include the multipliers justification topic in the July		Yes According to the website tariffs for 1/4/20 to				https://www2.terega.fr/en/what-we-can-offer/transport/transport-
France Tel	ega	Yes	Yes	Yes	Yes	deliberation in French	MWh/d	be maintained at the current level.	an IP is congested or not but it is not clear from the summary information what congestion means	November 2019 in the new tariff ATRT8	Only applied at domestic points.	30/9/20 will be maintained at the current level.	Yes Not applicable. Ex-post discounts are applied due to	Yes	Yes	contract/tariff.html http://www.mekh.hu/fulfilment-of-the-publication-requirement-set-by
Hungary FG Ireland Gas netwo	SZ rks Ireland	Yes	yes Yes	yes Yes	yes Yes	yes Yes	kWh/h MWh/d	Yes Yes	yes	Partial. No mention of the criteria in Art 28.3.a Yes	Partial. No mention of the criteria in Art 28.3.b Yes	yes Yes	lack of interruptions. Yes	yes	interruptions. Yes	article-29-of-tar-nc-2019 https://www.gasnetworks.ie/corporate/gas-regulation/tariffs/transmission-tariffs/
Netherlands G	rs	Yes	yes	Yes	Yes	Yes	kWh/h	Yes	Yes	Yes	Yes	Yes	Yes	Yes		https://www.acm.nl/en/publications/information-document-tariffs-nctariff-period-2020
Portugal REN Ga	sodutos	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Incomplete. No mention of the criteria in Art 28.3.a	Not applicable	Yes	Yes	Yes	Yes	http://www.erse.pt/eng/naturalgas/tariffs/Paginas/Parameters.aspx
Belgium FLL	XYS	Yes	Yes	Yes	Yes	Yes	kWh/d	Yes	Yes	yes	yes	Yes	Yes	Yes	Yes	https://www.fluxys.com/- /media/project/fluxys/public/corporate/fluxyscom/documents/fluxys- belgium/commercial/terms conditions-and-
									Bulgaria has not yet carried out the consultation on							contracts/transmission/publication article 30 1 b tariff- network code.pdf
Bulgaria Bulgart	ransgaz	Yes	Yes	Yes	Yes	Yes	kWh/d	Yes	Art. 28 in breach of Art. 27. The current multipliers and seasonal factors are not compliant with the requirements in Art. 13.	Yes	Yes	Yes	Yes	Yes	no	https://www.bulgartransgaz.bg/en/pages/prozrachnost-tarifi-132.htm
									Yes. Within the range specified in the article 13.2 of the NC TAR. Note for the further analysis: some					Effectively the ex-post discounts as price paid depends on		https://www.bulgartransgaz.bg http://www.plinacro.hr/UserDocsImages/Regulativa/Uredba%20TAR%2
Croatia Plin	acro	Yes	Yes	Yes	Yes	Yes	kWh/d	Yes	the NC TAR. Note for the further analysis: some multipliers are outside the range in Art. 13.1. By 2021 the consultations on the tariffs and the multipliers will be launched.	By 2021 the consultations on the tariffs and the multipliers will be	By 2021 the consultations on the tariffs and the multipliers will be launched.	Yes	Yes	the number of days of interruption per month. This will change in 2021 when a new tariff period starts.		http://www.plinacro.hr/UserDocsImages/Regulativa/Uredba%201AR%2 C%20%C4%8Dl%2030/Tekts%20za%20javnu%20objavu%20TAR%20NC% 0%C4%8Dlanci%2029%20i%2030-ENG.pdf#page=1
														of interruption in the past. The discount is set to an	The website explains that there was no serious probability of interruption in the past. The discount is set to an	
Denmark energ	net.dk	Yes	yes	Yes	yes	yes	kWh/d	yes	Seasonal factors do not apply	Yes	Seasonal factors not applied	yes	yes		approximate value using the TAR NC formula, which will be reviewed annually. Historical data should be provided when available.	
Germany Baye	rnets	Yes	Yes	Yes	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Yes	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.bayernets.de/start_gastransport_en.aspx?int_name=_642
Germany Fluxys De	utschland disp	ultiple sources (website, tariff sheet, art 29 file). The play different information (some 2019, some 2020) This complicates finding the right information.	•	On a high level yes, not in all details	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Only Cal Yr 2019 prices are available in the TSO website. Links are provided to BNetzA Regent decision and ENTSOG transparency platform	· ·	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Only Cal Yr 2019 prices are available in the TSO website. Links are provided to BNetzA Regent decision and ENTSOG transparency platform	Interruptible prices included but only for Cal Yr. 2019 2020 information is not available and a link is provided to BNetzA Margit decision.	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.fluxys.com/en/products-services/empowering-you/tariffs
Germany Flyxy:		Yes	On a high level yes, not in all details	On a high level yes, not in all details	V DC	English version of Margit/Beate	kWh/d	Only Cal Yr 2019 prices are available in the TSO website. Links	only Cal Yr 2019 prices are available in the TSO	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	(https://transparency.entsog.eu/#/) Only Cal Yr 2019 prices are available in the TSO website. Links are provided to BNetzA Regent decision and		·	Link provided to BNetzA decision and calculations (German	https://www.fluxys.com/en/products-services/empowering-you/tariffs
Germany Tryxy.	ILIVI	les	On a night level yes, not in all details	No reference to Art 29 itself on the	165	available only as of 21/06/2019	KWII) U	transparency platform	and ENTSOG transparency platform	Linguisti version of ivial git available only as of 21/00/2019	Seasonal factors flot applied	ENTSOG transparency platform (https://transparency.entsog.eu/#/)	provided to BNetzA Margit decision.	only). English version available only as of 21/06/2019	only). English version available only as of 21/06/2019	inttps://www.nuxys.com/en/products-services/empowering-you/tainis
Germany Gas	cade	Yes	Yes	website, just in the linked documents. The TSO notified that they are updating this to make the link more explicit	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Yes	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.gascade.de/en/our-network/tariff/
Germany Gastrans	port Nord	Yes	Yes	Yes	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Yes	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Link provided to BNetzA decision and calculations (German	https://gtg- nord.de/uploads/live/dms/167/20199528 tariffinformation 1.pdf
Germany Gasunie D	eutschland	Yes	On a high level yes, not in all details Tariffs are not easily accessible.	yes	No. There is a downloadable document	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Yes		Link provided to BNetzA decision and calculations (German	
Germany GRTgas Do	eutschland	Yes	Yes	Yes	BNetzA decisions.	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	yes	yes	Link provided to BNetzA decision and calculations (German	Link provided to BNetzA decision and calculations (German	https://www.grtgaz-deutschland.de/en/NC_TAR
				No reference to Art 29 itself on the website, just in the linked documents. The		English version of Margit/Beate									Link provided to BNetzA decision and calculations (German	
Germany N	EL	Yes	Yes	TSO notified that they are updating this to make the link more explicit	VQC	available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	yes	yes	only). English version available only as of 21/06/2019		https://www.nel-gastransport.de/en/our-network/tariff/
Germany NOV	/EGA	Yes	Yes	Yes	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	yes	yes	·	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.nowega.de/en/network_transparency/information_in_accdance_with_art. 29 30 tar_nc/tariff_period_2020.html
Germany ON ⁻	RAS	Yes	Yes	Yes	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	yes	yes	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.ontras.com/de/netztransparenz/transparenzdaten/
Germany OF	AL	ks from the ENTSOG website and OPAL website seer to work OK	On a high level yes, not in all details	Yes	Ι νΔς	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Yes		Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.opal-gastransport.de/netzinformationen/regulierte- netzentgelte/
Germany O	GE Link	ks from the ENTSOG and OPGE websites seem to be working OK	e On a high level yes, not in all details	Yes	Ι VΔς	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Possibly but not entirely clear	Possibly but not entirely clear	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.open-grid-europe.com/cps/rde/oge- internet/hs.xsl/Informationen-zur-Veroffentlichung-vor-der-Jahresauktion 2777.htm
Germany Terr	inets	Yes	On a high level yes, not in all details	Yes	VΔC	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	No (only for 2019)	·	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://www.terranets-bw.de/de/gastransport/gasnetz-informationen/
Germany Thyss	engas	Yes	On a high level yes, not in all details	Yes	Yes	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Yes	·	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	https://thyssengas.com/de/netzauskunft/transparenzinformation/veroentlichungen-von-informationen-gemaess-verordnung-eu-2017-460.htm
Germany Lubmin-	Brandov	2019: No 2020: Yes	Yes	Not able to connect to the links on the website	Vac	English version of Margit/Beate available only as of 21/06/2019	kWh/d	Yes	Yes	English version of Margit available only as of 21/06/2019	Seasonal factors not applied	Yes	Not interruptible capacity offered	Link provided to BNetzA decision and calculations (German only). English version available only as of 21/06/2019	Not interruptible capacity offered	http://www.lbtg.de/de/node/40
										According to NRA, the fact that the revenue equivalence principle is used with separate application between Entries and Exits of the					The TSO provides the historical nominations data in a raw	
Greece DE	SFA	Yes	Yes	Yes	Yes	Yes	For 2019, capacity is expressed in kWh/day, But for 2020, capacity is expressed in kWh/h	Yes	Yes	System and further to that the fact that the multiplier decreases exponentially as the number of contracting days increase, allows both for short-term facilitation and long-term signalling in parallel	Seasonal factors do not apply	Yes	Yes	Yes	format. The data does not show in a easy and accessible manner the interruptions.	http://www.docta.gr/rogulatod_corvucoc/trancmiccion/commiccion_
										to the avoidance of cross-subsidization and cost-reflectivity.						ENGLISH
Italy snam ı	ete gas	Yes	Yes	Yes	Yes	Yes	Yes. Charges are approved in volume units (standard cubic meters). However, for information purposes only, they are also published by the TSO in energy	Ves	Yes	Yes	Seasonal factors do not apply	Yes	Yes	Yes		http://www.snam.it/en/transportation/UE-fulfillments- reporting/transparency_template_reg_460-2017/index.html
Latvia conexus	Baltic grid	Yes	Yes	Yes	No	Only partially	units. kWh/d	No	Yes	Difficult to assess as info is only available in Latvian	Difficult to assess as info is only available in Latvian	No	Yes	Difficult to assess as info is only available in Latvian	No	ITALIAN http://www.snam.it/it/trasporto/adempimenti-reporting- UE/transparency_template_reg_460-2017/ https://capacity.conexus.lv/?id=178⟨=eng
	Only	y partially. The links provided lead to the ENTSOG T to documents not translated to English and to the	There is a downloadable document		There is a downloadable document but	Only partially. Some of the linked		Prices are only available for Cal Year 2019. Tariffs for 2020 are	e e	The justification of multipliers and seasonal factors is in Lithuanian only for year 2019. The justification for 2020 is provided in full and		Prices are only available for Cal Year 2019. Tariffs for		· · · · · · · · · · · · · · · · · · ·		
Lithuania Ambe		consultation (not the final NRA decision) without specifying the specific sections where the relevant information can be found	·	d Yes	it does not contain all the required information.	documents are not translated to English.	kWh/d	based on the tariff consultation. The final decision will be available soon.	Yes	in English here: https://www.ambergrid.lt/en/about-us/public-consultations	Not applicable	2020 are based on the tariff consultation. The final decision will be available soon.	Yes	Yes	Yes	https://www.ambergrid.lt/uploads/documents/2019-kainos/TAR_NC.pd
OGP GAZ-S		Yes	Yes	Yes	Yes	Yes	MWh/h	Yes. From 1 October 2019 to 31 December 2019 the 2019 tari is applied and from 1 January 2020 to 30 September 2020 the		Yes	Yes	Yes	Yes	Yes		TSO: http://en.gaz-system.pl/fileadmin/pliki/taryfa/en/2019/Publikacja_informacji_art_29_020_ENG.pdf,
· ·	on network)							2020 tariff.	multipliers are outside the range specified in Art. 13.1.						— Not applicable	URE: https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/paliwa-gazowe/3779,Taryfy-opublikowane-w-2019-r.html
Roland (network or		Yes	Yes	Yes	Yes	Yes	MWh/h	Yes. From 1 October 2019 to 31 December 2019 the 2017 tari is applied and from 1 January 2020 to 30 September 2020 the		Yes	Yes	Yes	Yes	Yes		TSO: https://www.gaz-system.pl/fileadmin/pliki/taryfa/pl/2019/Publikacja_informacji_art_29_020_SGT.pdf,
EuRoPol operate								2020 tariff.								URE: https://bip.ure.gov.pl/bip/taryfy-i-inne-decyzje-b/paliwa-gazowe/3779,Taryfy-opublikowane-w-2019-r.html
Romania Trar	sgaz	Yes	Yes	Yes	Yes	Yes	kWh/d	Yes	Yes. Within the range specified in the article 13.2 of the NC TAR. Note for the further analysis: some	yes	yes	yes	yes	Yes	Not applicable. Regarding the interruptible capacity, NRA had taken only the historical flows and the situation of those capacities. The future interruptions (if any) will be treated in	hathan a laboration and an alternative in the second and a
								Information available via the link is only for Cal Yr 2019. The	()uartorly multipliars are outside the range. The tariff	Multipliers not justified against the criteria in Art 28.3.a - The tariff		Information available via the link is only for Cal Yr 2019. The TSO provided a link via ENTSOG but this link is not	Ex post discounts applied but not in accordance with	h	respect with art. 16 (4). No flow or forecast data - there current calculation of	
Slovakia Eust	ream	nks are provided with no information of where they lead to.	Yes	Yes	Yes	Yes	MWh/h	TSO provided a link via ENTSOG but this link is not available at the TSO's website: https://www.eustream.sk/files/docs/eng/Pricelist_2020.pdf	period doesn't change until 2022, multipliers will be	Multipliers not justified against the criteria in Art 28.3.a - The tariff period doesn't change until 2022, multipliers will be TAR NC compliant then.	Not applicable	available at the TSO's website:	Ex post discounts applied but not in accordance with Art 16.4 - there tariff period doesn't change until 2022, interruptible will be TAR NC compliant then	Yes	interruptible is not based on Probability of interruption, this will be TAR NC compliant when they change tariff period 2022.	
		ijally Links leed to d		Not always to	Voc hut it i	Partially. The NRA has communicated					Within the rest of the second		Ex post discounts applied. Not clear whether compensation is in line with Art 16.4. The NRA provided a link where this information is clarified. The			http://www.plipacediat/
Slovenia Plino	ovodi	tially. Links lead to documents but not to the releva parts of the document.	Yes	Not always. Information on interruptible products is difficult to find.	Yes, but it does not contrail all the information.	that a translation will be shortly available.	kWh/d	Yes	Yes	Within the range specified in the article 13.1 of the NC TAR.	Within the range specified in the article 13.1 and 13.2 of the NC TAR.	yes	document is nevertheless in Slovene and this information could not be clarified. The NRA communicated that this information will be translated	Yes	Yes	http://www.plinovodi.si/media/4845/article-29-and-30-of-tar-nc-publication-3152019.pdf
									Multipliers less than 1 apply to monthly and daily				shortly.			https://www.nationalgridgas.com/charging/transmission-system-chargin-system-charging/transmission-system-charging/transmission-syste
UK Nation	al grid	Yes	No	No	Yes	Yes	kWh/d	Cannot see any prices applicable beyond Gas Year 2019	products but this is not clear from the charging statement	Within the range specified in the article 13.1 of the NC TAR.	Not applicable	L Cannot coo any prices applicable beyond Cas Vear 2010	Partially. Interruptible capacity is free in day but this i not immediately obvious from the charging statemen	No justification as tar as Lean coo	No	Further select "NTS transportation charging statements" and "Final Notices"
<u> </u>																
UK/BE II	JK .	yes	No	No	Yes	Yes	kWh/d	Derogated	Derogated	Derogated	Derogated	Derogated	Yes	Yes	which is not clearly explained. BBL argues that the historical data is not valid to estimate the	https://www.interconnector.com/media/127108/iuk-charging-statemeissue-18-01-june-2019.pdf
UK/NL B	BL	yes	yes	No	Yes	Yes	kWh/d	Derogated	Derogated	Derogated	Derogated	Derogated	Yes	Yes	probability and proposes a discount of 10% until further	https://www.bblcompany.com/services/tariffs/tariffs-forward-flow
				Nig	No	N.o.	LANDA /-I	NI n	Only for Cal Very 2010	No.	No.	N. n.	Only for Cal Viv 2010	No	NI a	
Spain ena	goc.	The state of the s	No	No	No	No	kWh/d	No	Only for Cal Year 2019	No	No	No	Unly for Cal Yr 2019	No	No	1

Exempted
Luxembourg creos
Finland gasum
Sweden Swedengas

Derogated by Ofgem from Art. 29.a and
- Art. 29.b.i, but Art. 29.b.ii applies

GB BBL
BE. GB IUK





GasNCFunc Issue Solution
Ex-post interruptible capacity products
TAR1203-19
4 June 2019
FINAL

Gas Network Codes Functionality Process Issue Solution

Issue details	
Number:	501-18-10-12-1203
Name:	Inconsistencies in the publication of reserve price
	information prior to the annual yearly capacity auctions
Reporting party:	European Federation of Energy Traders
Network Code / Guidelines	Network Code on Harmonised Transmission Tariff
concerned:	Structures for Gas, Commission Regulation (EU)
	2017/460
Article of the Network Code /	Articles 29, 31 and 32
Guidelines	
Category:	European issue
Abstract:	•

EFET FUNC case description: In order to form capacity booking strategies and facilitate efficient portfolio management, traders need to know, with certainty, what reserve prices will apply for at least the forthcoming gas year before the yearly capacity auctions, along with any multipliers and seasonal factors for short term capacity products. To the extent such information is not provided, or provided inconsistently, traders face unmanageable price risk and may flow gas sub-optimally, which creates market inefficiency. A review of the information published prior to the most recent yearly capacity auctions will serve to improve the completeness and consistency of data published in future years.

Issue solution(s)	
Publication date:	4 June 2019

ACER and ENTSOG have checked the status of the publication requirements under Article 29 for 2018, for each TSO/NRA. Following this review, ACER and ENTSOG have completed a series of recommendations for NRAs and TSOs to follow in the publication of the requirements under Article 29 for the July 2019 auction. These recommendations aim to improve the implementation of publication requirements pursuant to Article 29:

- All information listed in Article 29 shall be published no later than thirty days before the annual yearly capacity auctions for IPs and other points where the NRA has taken a decision to apply Regulation (EU) 2017/459.
 - The annual capacity reserve prices published (both firm and interruptible) shall cover the whole of the subsequent gas year and be binding throughout this time (except where Article 12.3 (a) or (b) applies).



GasNCFunc Issue Solution
european network
of transmission system Upconsistencies in the publication of reserve price
for gas
information prior to the annual yearly capacity auctions

- Where the tariff period is not a gas year, the annual capacity reserve prices published must, nevertheless, cover the entire subsequent gas year. These may take the form of single weighted average annual reserve prices covering the two tariff periods, or separate annual reserve prices relating to each tariff period. In such instances, where the annual reserve prices for the respective tariff periods are subject to pre-defined methods of indexation this shall be clearly stated and explained
- The annual capacity reserve prices shall be expressed in energy units (kWh/h or kWh/d). This is a requirement under Article 10 of the CAM NC. As a good practice, ACER and ENTSOG recommend to provide a conversion to EUR if the currency is other than EUR.
- Multipliers and/or seasonal factors at IPs, where applicable, should be justified against each of the criteria listed in Article 28.3.
- When assessing the probability of interruption, historical and/or forecasted data which precipitate interruptions (for example, network flow scenarios) should be provided to support such assessments.
- Article 31(1)(a)-(d) requires that the information is published in a user-friendly, clear, easily accessible, and downloadable form, and in English to the extent possible. ACER and ENTSOG recommend NRAs and TSOs to:
 - Provide a single downloadable file containing all the information required by Article 29.
 - Structure the information following the sub-points of Article 29 as per ENTSOG's template: link. The link(s) in the template should refer to the relevant parts of the document where the information is contained (i.e. the correct page of the document).
 - Use excel or pdf formats.
 - Provide a clear link on the NRA/TSO website referring to the publication of information under Article 29 that leads the single downloadable file.
 - Publish link on ENTSOG's TP.
 - Make every effort to publish the information in English as well as the national language and to the extent this is not possible please explain why.

ACER will check the Article 29 information published for the July 2019 auction and the extent to which it is in accordance with these recommendations. An overview of the findings will be published on FUNC platform by the end of September.