

**Framework Guidelines
on Interoperability Rules for European
Gas Transmission Networks**

Annex to the Scoping Document

(Questionnaire)

23 August 2011

Introduction

Framework Guidelines aim at setting clear and objective principles for the development of network codes, pursuant to Article 6(2) of Regulation (EC) No 715/2009 (the “Gas Regulation”)¹. The Framework Guidelines on Interoperability Rules for European Gas Transmission Networks pursuant to Article 8 (6) (e) may cover or be interlinked with areas as defined in Article 8 (6) (d), (f), (g) and (j) of Regulation (EC) No. 715/2009.

The purpose of the current scoping exercise is to determine what approach and what issues should be part of the Framework Guidelines on Interoperability Rules as well as at what level of detail these issues should be addressed.

The following questions do relate to the various Sections of the Scoping Document and are intended to facilitate stakeholders in formulating their views on the potential scope of the upcoming Framework Guidelines.

Stakeholders are invited to answer these questions by e-mail (workshop2011E04@acer.europa.eu) preferably before the workshop to streamline and generate discussions at the workshop. The workshop will take place in Ljubljana on 13 September 2011. Answers will be accepted after the workshop as well, but no later than 19 September 2011.

Questions

Questions to be answered on Definition:	
2.Q1	Do you have a different understanding of the term “interoperability” as compared to the definition above? If yes, please explain what in your view the term should cover and why so?
2.Q2	Is the definition sufficiently clear to separate out the issues to be treated in this Framework Guideline against issues treated in other Framework Guidelines? If not, please make specific suggestions how the definition could be made clearer.
2.Q3	Would an even wider scope of definition be needed? Would for instance the inclusion of the interoperability of electricity and gas (transmission) grids (e.g. via “power-to-gas” and “gas-to-power” applications) be sensible in your view and to what extent this could be beneficial?
2.Q4	In your view, should the Framework Guideline on Interoperability Rules serve as a central reference document on issues regarding technical and

¹ Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005.

Questions to be answered on Definition:

	operational harmonisation for gas systems including transmission, LNG, storage and distribution?
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Questions to be answered on Application:

3.Q1	Do you agree with the preliminary proposal for the application of this Framework Guideline? If not, please explain how the area of application should change in your view and provide reasoning for your answer.
3.Q2	At this stage, the areas of application of the Framework Guidelines on Capacity Allocation Mechanisms and on Balancing are different. Should the application of the Framework Guideline on Interoperability Rules be aligned with one of these? If so, with which one and why?
3.Q3	Should there be a possibility to fine-tune the application of the Framework Guideline when it comes to different kinds of entry/exit points or different issues, such as nomination process, gas quality, etc., which are addressed in the Framework Guideline? Please give reasoning for your proposal.

Questions to be answered on the Nomination Process:

4.1.Q1	Regarding the nomination process, in your view, what are the barriers (to trade/entry) that require regulatory attention at European level? And why? (Which of the issues listed above do you consider to be important barriers, and why? What other issues constitute a barrier in your view, and why?) Why are the barriers you identified best addressed by including them for consideration within the scope of this Framework Guideline?
4.1.Q2	Are there any other topics (such as data format, communication and units) that are important to consider under the heading of the nomination process, besides those that are being mentioned later on in the document (gas day; nomination scheme; operational constraints)?

Questions to be answered on Gas Day:

4.1.1.Q3	Should a definition of the gas day be included in the Framework Guideline on Interoperability Rules or is the definition in the FGs CAM and Balancing sufficient?
4.1.1.Q4	Is a methodology needed on how daylight saving time is to be applied with regard to the gas day?

Questions to be answered on the Nomination Scheme:

4.1.2.Q5	<p>Regarding the applicable re-nomination regimes, what are the barriers to cross-border trade or entry that require regulatory attention at European level?</p> <p>Why are these barriers best addressed by including this issue within the scope of this Framework Guideline?</p>
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Questions to be answered on Operational Constraints:

4.1.3.Q6	<p>Regarding operational constraints, what are the barriers to cross-border trade or entry that regulators should seek to address at European level?</p> <p>Why are these barriers best addressed by including this issue within the scope of this Framework Guideline?</p>
4.1.3.Q7	<p>Knowing that there is also a specific network code to be developed on operational procedures in an emergency, should this issue be better placed in a dedicated Framework Guideline or integrated in this Framework Guideline on Interoperability Rules?</p>

Questions to be answered on Interconnection Agreements:

4.2.Q1	<p>Regarding interconnection agreements (and the associated issues listed above), what are the barriers to cross-border trade or entry that require regulatory attention at European level?</p> <p>Why are these barriers best addressed by including this issue within the scope of this Framework Guideline?</p>
4.2.Q2	<p>Would it be sufficient to pinpoint at issues as a minimum content of an agreement (i.e. standardisation of the minimum content of an agreement) or is there a need to specify the issues directly and in detail and propose them for harmonisation? Or both? Please reason your answer.</p>
4.2.Q3	<p>Do you agree that topics like matching, rules for flow control, measurement principles of gas quantities and quality, rules for allocating measured quantities, exceptional events and changes to the agreement form a minimum set of issues to be harmonised? Are there more issues from the interconnection agreement that look for harmonisation? Please reason your answer.</p>

Questions to be answered on Units Harmonisation:

4.3.Q1	<p>Regarding the use of units, what are the barriers to cross-border trade</p>
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Questions to be answered on Units Harmonisation:	
	or entry that require regulatory attention at European level? Are these barriers best addressed through the Framework Guideline on Interoperability Rules and the related network code, or elsewhere? Please set out your reasoning.
4.3.Q2	Units like Pressure, Energy, Volume, Temperature, and Gross Calorific Value are considered as relevant. Are there any other units relevant to overcome barriers as identified?

Questions to be answered on Gas Quality:	
4.4.Q1	Regarding gas quality, what are the barriers to cross-border trade or entry that require regulatory attention at European level? Why are these barriers best addressed by including this issue within the scope of the Framework Guideline? Or should they be addressed elsewhere? Please set out your reasoning.
4.4.Q2	Is there need in Europe to harmonise certain aspects of gas quality (not only related to the different parameters but also to odourisation or different gas products like biogas and low calorific gas)? If so, please specify what aspects require harmonisation and why? Please provide your detailed reasoning.

Questions to be answered on Data Exchange:	
4.5.Q1	Regarding data exchange, what are the barriers to cross-border trade or entry that requires regulatory attention at European level? Why are these barriers best addressed by including this issue within the scope of the Framework Guideline? Please set out your reasoning.
4.5.Q2	The Framework Guideline on Capacity Allocation Mechanisms already includes provisions to promote exchange of information for capacity booking and transfers of capacity rights. Shall the Framework Guideline on Interoperability Rules be used to set out the general principles on data exchange for a larger scope of application?
4.5.Q3	Shall a specific standard protocol for data exchange be defined in the Framework Guideline or should this be left to the Network Code?

Questions to be answered on Capacity Calculation:	
4.6.Q1	Regarding capacity calculation methodology and underlying technical parameters, what are the barriers to cross-border trade or entry that

Questions to be answered on Capacity Calculation:	
	<p>require regulatory attention at European level?</p> <p>Are these barriers best addressed through the interoperability framework guideline and network code, or elsewhere? Please set out your reasoning.</p>
4.6.Q2	<p>Is there an additional need to further specify the methods of capacity calculation? If yes, please specify what you believe is necessary and whether the principles for these methods should be specified in this Framework Guideline? Please give reasoning along your answer.</p>

Questions to be answered for Supplementary Issues:	
4.7.Q1	<p>What else (other than the six 'issues' already listed and discussed) should be included within the scope of this Framework Guideline?</p> <p>Please describe the barriers (to trade/entry) related to these issues and why these barriers are best addressed by including this issue within the scope of the Framework Guideline.</p>
4.7.Q2	<p>Should any of the following areas – from Article 8(6) of Regulation (EC) 715/2009 – be included in the scope of this Framework Guideline in order to use resources more efficiently, or should they be kept separate:</p> <ul style="list-style-type: none"> a) network security and reliability rules; b) network connection rules; c) third-party access rules; d) data exchange and settlement rules; e) operational procedures in an emergency? <p>Please give a separate reasoning for each area.</p>
4.7.Q3	<p>Should any of the six 'issues' already listed be <u>excluded</u> from the scope of the Framework Guideline? Please give your reasoning.</p>