

Consultation Report 31

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1. INTRODUCTION

As from 23 October to 7 December 2018, Fluxys Belgium consulted the market on amendments of the transmission regulatory framework, i.e. the Standard Transmission Agreement (STA), the Access Code for Transmission (ACT) and the Transmission Programme (TP).

The proposed modifications in the regulatory documents aim at:

- (i) simplifying and streamlining the booking processes;
- (ii) enabling the injection of renewable gases into the grid;
- (iii) finetuning the offer of short haul services;
- (iv) enlarging interruptible services through “overnominations”;
- (v) adjusting the offered substitution services – remove reshuffling;
- (vi) bringing some additional technical improvements.

Considering the current regulatory situation with regards to the balancing activities in the Belux area, the consultation has been exceptionally conducted simultaneously on two sets of documents:

- For the phase 1- current (Fluxys Belgium operates as Balancing operator for the Belux area) : the last version of the regulated documents as approved by the CREG on 16 April 2018.
- For the phase 2 – pending (Balansys becomes Balancing operator in the BeLux area) : the last version of the regulated documents as consulted in March 2018 (consultation 27).

2. CONSULTATION PROCESS

Fluxys Belgium launched this market consultation by publishing the proposed documents on its website - at the usual location for such consultations, supported by an announcement on the homepage - and via direct e-mailing to all registered market participants and associations. The consultation is available on our website via the following link: <https://www.fluxys.com/belgium/en/Services/Transmission/MarketConsultations/HistoryConsultation>. During the period from 23 October until 7 December 2018 (included), stakeholders were invited to submit their written feedback and, if needed, ask additional information through bilateral contacts with Fluxys Belgium. An information session was also organised at Fluxys Belgium headquarters on 24 October 2018, where the proposed changes have been detailed and discussed with around 30 market participants, whereof 14 participated the online session.

Taking into account the different comments received, Fluxys Belgium submits for approval to the CREG, the so amended version of the STA, ACT and TP.

3. OUTCOME OF CONSULTATION PROCESS

All comments received are listed and individually treated in the “Q&A’s”, included in the consultation report submitted to CREG – see appendices.

Feedback was received from 1 individual Grid User and 2 representing organisations on the following topics.

Simplification of processes and services

Respondents that commented on the simplification proposals –booking processes– welcome these initiatives by Fluxys Belgium. No suggestions or questions were raised in order to extend the introduction of the Reduced Pressure Service (RPS) that will replace the MP and DPRS. Neither were clarifications needed for the modifications regarding to booking processes for quality conversions L>H, entry/exit services for the domestic market, OCUCs and wheelings.

Considering the comments received, the proposal will be submitted for CREG approval, as consulted. The details of these service changes are set out in ACT – Attachment A and B.

Renewable gases

Respondents generally speaking welcomed the proposal to enable the physical injection of renewable gas into our network. In addition, one market participant invites Fluxys to start a broad reflection with stakeholders on the impact of the injection of biomethane into the TSO grid, as these injections could have an impact on gas quality and quality variations. Fluxys Belgium wants to emphasize that all injected gas must comply with the applicable requirements of natural gas. Specifically for renewable gas, Synergrid has established specific requirements applicable for biomethane injection. Nevertheless, Fluxys Belgium welcomes the invitation for a further discussion on this topic.

Considering the comments received, the proposal will be submitted for CREG approval, as consulted. The details of these services are set out in ACT – Attachment A, B, C1 and C4.

Overnomination

No specific remarks were made on the proposal of Fluxys Belgium to allow network users to nominate more than they have subscribed upfront via ‘overnomination’. The few questions that were raised during the info session, to clarify this new service a bit more in detail, are treated in the Q&A appendix.

Considering the comments received, the proposal will be submitted for CREG approval, as consulted. The details are set out in ACT – Attachment A, B, C and E.

Substitution services

Most of the stakeholders had no specific comments on the removal of the reshuffling service. Yet, some parties suggested to keep the service on an enduring basis. Some of them even suggested to further enhance the proposed service towards more short term flexible options (quarterly, monthly or even daily and allow an entry service to be reshuffled in an exit service and/or vice versa). Fluxys Belgium believes that the reshuffling service, that was exceptionally offered in 2018 for the shippers having capacities active across the entire tariff period 2020-2023 (or the closest period expressed in gas years GY19-GY22), already provided an important flexibility to existing contract holders, while meeting CAM NC compliancy in a pragmatic and efficient way. Furthermore the chosen multi-year approach coincides with the nature of existing long term contracts and the upcoming tariff period, for which visibility on contracted quantities is key. As a consequence, Fluxys Belgium doesn’t intend to go beyond this proposal. The reason why Fluxys removed surrenders from its product sheet is because it entails high complexities for substitution services as a whole. For example, with surrenders it’s not possible to provide substitution services on PRISMA or OCUC for diversion services. These changes are already offered since 25/09 in test phase for deliveries as from 1/10, but will now be adjusted in the regulatory documents.

Other clarifications questions are treated in the appendix. Considering the comments received, the proposal will be submitted for CREG approval, as consulted. The details of these changes are set out in ACT – Attachment A and B.

VIP BE-NL

The topic of a VIP between Belgium and the Netherlands was already consulted in consultation #27 (Q1 2018) and the remarks were treated in the accompanying consultation report. Notwithstanding the generally positive feedback from the market participants, Fluxys Belgium decided back then to temporarily remove VIP BE-NL from the regulatory documents as GTS suspended the project until further clarification was obtained on the applicable European regulatory framework for VIP.

In the meantime, ACER, ENTSOG and the European Commission have been consulted and CAM NC was not adjusted. Both GTS and Fluxys Belgium decided to proceed with the project as consulted and fixed an implementation target date of 1/1/2020 – subject to final confirmation in 2019.

VIP BE-NL is therefore re-introduced in the regulatory documents (ACT – Attachment A and B.) and submitted to CREG for approval as consulted in consultation #27, since no changes are applied regarding the initially consulted model.

Technical changes - Textual corrections

Several definitions have been modified (without changing their meaning) to make them aligned with the terminology used in the EU NC. No comments were received, whereby the proposed changes will be part of the final proposal submitted as consulted. At last, as no volume liable contract longer exists (the last volume liable contract has been converted in energy unit during Q4/2018), Fluxys Belgium proposes, as announced during the info session, to remove all references to volume liable contracts.

Several textual errors were reported and have been corrected in the submitted documents. The textual adjustments can be found in Attachment A, B, C and E of the ACT and in the Transmission Program.

4. APPENDICES

4.1 Appendix 1: Market consultation – public material

4.2 Appendix 2: Market consultation – confidential material