



Consultation 56 report



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1 Introduction

From the 16th of May 2022 until the 6th of June 2022 included, Fluxys Belgium consulted the market on its proposed changes in the regulatory documents.

The proposed modifications in the regulatory documents aim at changes to the Access Code for Transmission and Transmission program for the subscription and allocation of Entry services on Dunkirk.

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. During the period from May 16th until June 6th (included), stakeholders were invited to submit their written feedback and if needed, seek additional information through bilateral contacts with Fluxys Belgium.

Taking into account the different comments received, Fluxys Belgium submits for approval to the CREG, the so amended version of the Access Code for Transmission and Transmission Program.

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 the CREG – see appendices. Feedback was received from 4 individual Network Users and 1 Terminal Operator, most of them welcoming and supporting the proposed changes. There was one party that expressed his concern that it could further deepen the already congested situation at the Virtualys interconnection.

4 Appendices

4.1 ***Appendix I: Market consultation – public material***

4.2 ***Appendix II: Market consultation – confidential material***

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1. Market consultation - public material

- a. E-mail: invitation to submit comments
- b. List of documents in consultation
- c. Questions & Answers
- d. Printed copy of written comments

E-mail: invitation to submit comments

Fluxys Belgium: Market Consultation 56: Changes in the regulatory documents for transmission

From 16 May to 6 June 2022, Fluxys Belgium is holding a market consultation on the regulatory documents applicable for transmission. This market consultation will focus on:

- Changes for the subscription and allocation of Entry services on Dunkirk LNG

The following document summarizes the proposed changes: [One page note](#)

Documents in consultation (with track changes)

- [Transmission Program](#)
- [Access Code for Transmission Attachment B](#)

You are kindly invited to send your written comments to marketing@fluxys.com by Monday June 6th 2022 close of business.

Please specify in your response, whether the content is to be treated as confidential or not. Unless otherwise mentioned, all comments will be treated as non-confidential.

Yours sincerely,



Ilse Guedens
Marketing Manager



Leentje Vanhamme
Director Commercial Regulated

List of documents in consultation

The documents are available on our website: [Fluxys Belgium - Market Consultation 56 - Changes in Regulatory Documents](#)

From 16 May to 6 June 2022, Fluxys Belgium is holding a market consultation on the regulatory documents applicable for transmission. This market consultation will focus on:

- Changes for the subscription and allocation of Entry Services on Dunkirk LNG

The following document summarizes the proposed changes: **One page note**

Documents in consultation (with track changes)

- **Transmission Program**
- **Access Code for Transmission Attachment B**

Questions & Answers

Questions and Answers

#	From	Confidential?	Topic	Questions / Comments by Stakeholders	Answers / Comments by Fluxys Belgium
1.	Socar	No	Supportive reaction	<p>SOCAR Trading Gas and Power Sarl is supportive to the proposed adjustment of Fluxys access code for transmission to change the current allocation rules of the entry Services from Dunkerque terminal to Belgium gas network by a pro-rata basis based on the newly subscribed regasification capacity at Dunkerque terminal. We also support the proposal that the allocation request shall be included in the submission request for the Service during the Call for Market Interest organised by Dunkerque LNG.</p> <p>Considering the current geopolitical situation in Europe, the allocation process of new regasification capacity shall include (if possible) sufficient entry access to different gas networks in EU to ensure as much as possible a diversification of the gas supply.</p>	
2	Engie	No	Supportive reaction	<p>ENGIE welcomes Fluxys' proposal on the subscription and allocation of Services on Dunkirk LNG, as we feel that it is a sensible solution to manage transmission capacity at LNG points.</p>	/
3	Dunkerque LNG	No	Supportive reaction	<p>Dunkerque LNG believes that adding the possibility of a pro-rata allocation of the remaining entry capacity towards Belgium, based on the outcome of our terminal's long term capacities sales, will contribute to the security of supply by bringing new LNG to the EU and increase the liquidity of the European gas markets.</p>	/
4.1	RWE S&T	No	Supportive reaction	<p>RWE Supply & Trading supports the proposal described in the above market consultation as it is consistent with and supportive of the Dunkerque "call for market interest" capacity sales process.</p>	/
4.2	RWE S&T	No	Capacity congestion	<p>We are concerned however, that such "reservation" of Virtualys capacity for additional LNG entry capacity could further deepen the already congested situation at the Virtualys interconnection.</p> <p>So instead of relying on already existing interconnection capacity, we strongly suggest there is a need to increase the current French interconnection capacity, by either increasing Virtualys capacity or by enabling physical reverse flow at Obergailbach.</p>	<p>Putting the capacity at Virtualys also allows Network Users to bring the gas from the CMI to Belgium but with the need to book additional Entry and Exit capacity in France.</p> <p>Just increasing the capacity from France to Belgium would not bring additional gas to the requesting countries (the Netherlands or Germany) because the downstream capacity is already highly used. Obergailbach is an Interconnection Point between France and Germany so we have no comment on this topic.</p>

Printed copy of written comments

All reactions			
Company	First Name	Last Name	Confidential
Socar Trading	Francesca	Di Cesare	No
Engie	Nasma	Sahbani	No
Dunkerque LNG	Cedric	Vandenbroucke	No
RWE Supply and Trading GmbH	Steve	Rose	No



Francesca Di Cesare <fdicesare@socartrading.com>

To: marketing@fluxys.com

Cc: [Vincent Mohy](#); [Wilfried Staub](#); [Rosario Sgaroto](#); [Compliance](#); [LNG](#)

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Dear Fluxys team,

In reference to the Market Consultation # 56 (launched by Fluxys on 16th May 2022), SOCAR Trading Gas and Power Sarl is supportive to the proposed adjustment of Fluxys access code for transmission to change the current allocation rules of the entry Services from Dunkerque terminal to Belgium gas network by a pro-rata basis based on the newly subscribed regasification capacity at Dunkerque terminal. We also support the proposal that the allocation request shall be included in the submission request for the Service during the Call for Market Interest organised by Dunkerque LNG.

Considering the current geopolitical situation in Europe, the allocation process of new regasification capacity shall include (if possible) sufficient entry access to different gas networks in EU to ensure as much as possible a diversification of the gas supply.

Please let us know if you require any further clarification from our side

Best regards

Francesca



Francesca Di Cesare
Senior LNG Trader

SOCAR Trading SA
Rue du Rhône 40, 1204 Geneva, Switzerland
Phone: +41 22 562 0103, Mobile: +41 79 783 1338
fdicesare@socartrading.com

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Market Consultation 56 : ENGIE's response



nasma.sahbani@engie.com

To marketing@fluxys.com

Cc emilie.taquet@engie.com; beatrice.debacker@engie.com

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Dear team,

Please find below ENGIE's comment on the changes proposed in the market consultation n°56 :

ENGIE welcomes Fluxys' proposal on the subscription and allocation of Services on Dunkirk LNG, as we feel that it is a sensible solution to manage transmission capacity at LNG points.

Kind regards,

Nasma SAHBANI
Global Energy Management
Capacity Portfolio Manager



1, place Samuel de Champlain
92930 Paris La Défense Cedex - FRANCE
Phone +33 7 86 91 18 97
nasma.sahbani@engie.com

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Market Consultation 56 - Feedback DKLNG



Cedric VANDENBROUCKE <c.vandenbroucke@dunkerquelng.com>

To marketing@fluxys.com

Cc Dunkerquelng Commercial; Olivier HEURTIN

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Dear,

We hereby provide our support for the proposed changes as explained in the Public Consultation.

Dunkerque LNG believes that adding the possibility of a pro-rata allocation of the remaining entry capacity towards Belgium, based on the outcome of our terminal's long term capacities sales, will contribute to the security of supply by bringing new LNG to the EU and increase the liquidity of the European gas markets.

Best regards,

Cedric

Cedric Vandenbroucke
Commercial Director

M +33 (0)7 62 89 93 61
c.vandenbroucke@dunkerquelng.com
Dunkerque LNG • 10 Rue Aubert • 75009 Paris • France

www.dunkerquelng.com | [LinkedIn](#) | [Twitter](#)



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Stephen.Rose@rwe.com
To: marketing@fluxys.com
Cc: Dominikus.Priller@rwe.com

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Dear Sirs,

RWE Supply & Trading supports the proposal described in the above market consultation as it is consistent with and supportive of the Dunkerque "call for market interest" capacity sales process.

We are concerned however, that such "reservation" of Virtualys capacity for additional LNG entry capacity could further deepen the already congested situation at the Virtualys interconnection. So instead of relying on already existing interconnection capacity, we strongly suggest there is a need to increase the current French interconnection capacity, by either increasing Virtualys capacity or by enabling physical reverse flow at Obergaibach.

Best regards,

Steve Rose
Head of Gas Market Design and Regulation
RWE Supply & Trading GmbH
Windmill Hill Business Park,
Whitehill Way, Swindon SN5 6PB,
United Kingdom
Tel: +44 (0)1 793 475279
Mob: +44 (0)7 989 494269
E-Mail: stephen.rose@rwe.com