

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:	
<p><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></p>	

Issue solution(s)	
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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.