Picture courtesy of Gas Connect Austria

# Public Consultation – Main Results

## Public Consultation – FUNC issue "Missing harmonisation of interfaces on capacity platforms"

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# Participants



9
30%

21
70%

■ 1 Market Area

■ More than 2 Market Areas

Countries

1

1

1

1

1

4

1

7

7

1

1

1

2

1

1
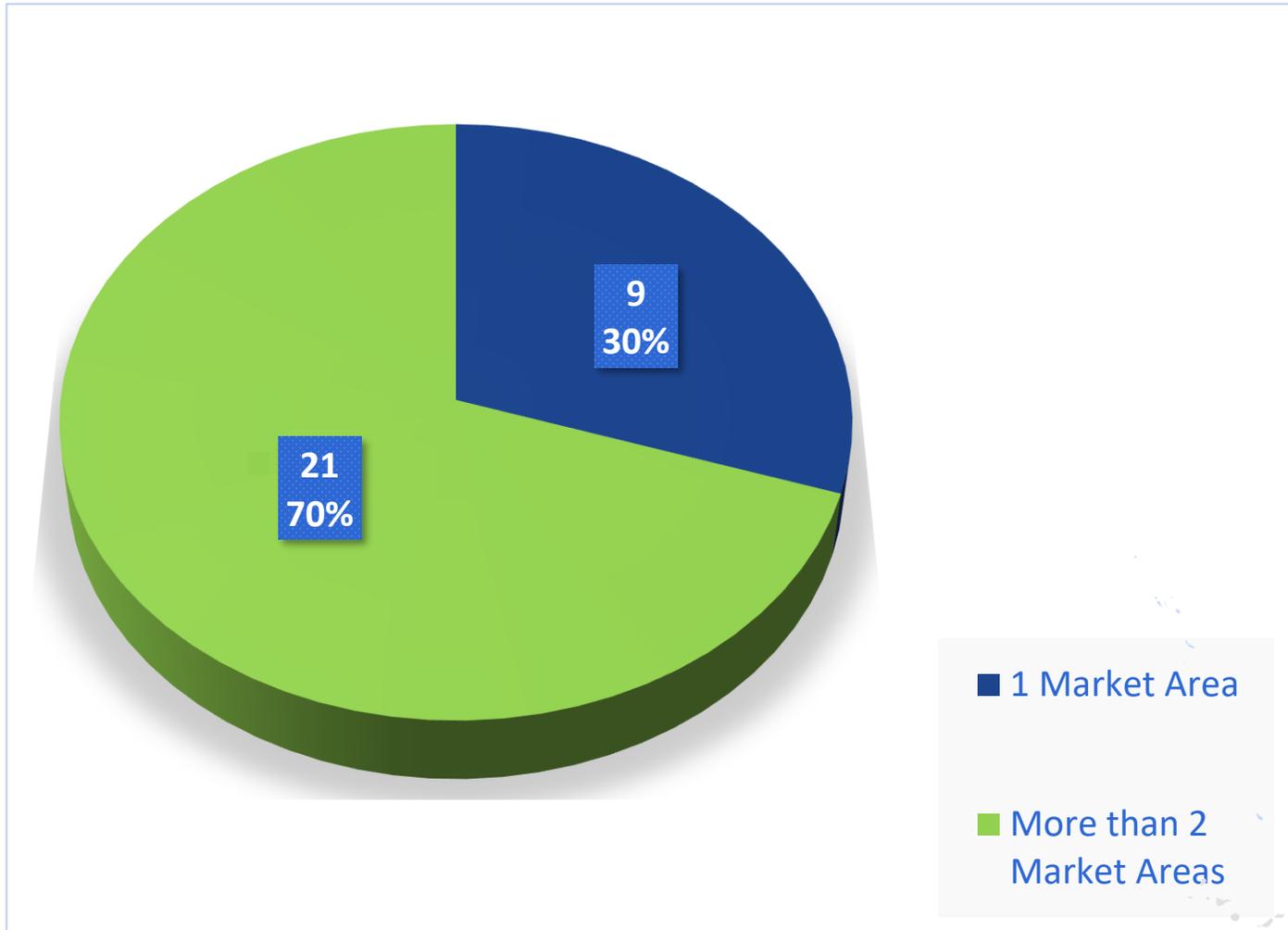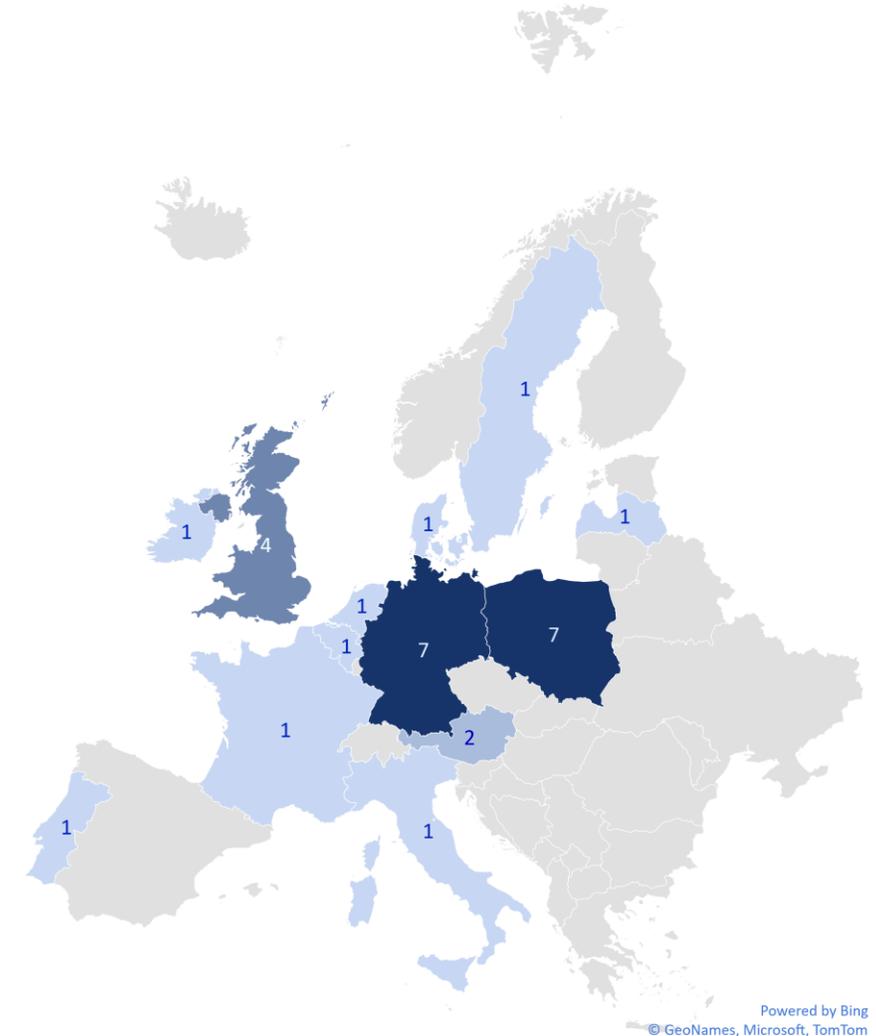
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# Participants



- BRP / CRP (Balance / Capacity Responsible Party) — 15, 50%
- System Operators — 8, 27%
- Capacity Booking Platform Operator — 3, 10%
- Other Role — 4, 13%

# System Operators



Legend:
- SO with multiple roles (TSO, CRPO, SSO, Area Coordinator, VTP Operator)
- TSO (Transmission System Operator)
- LNG Operator
- SSO
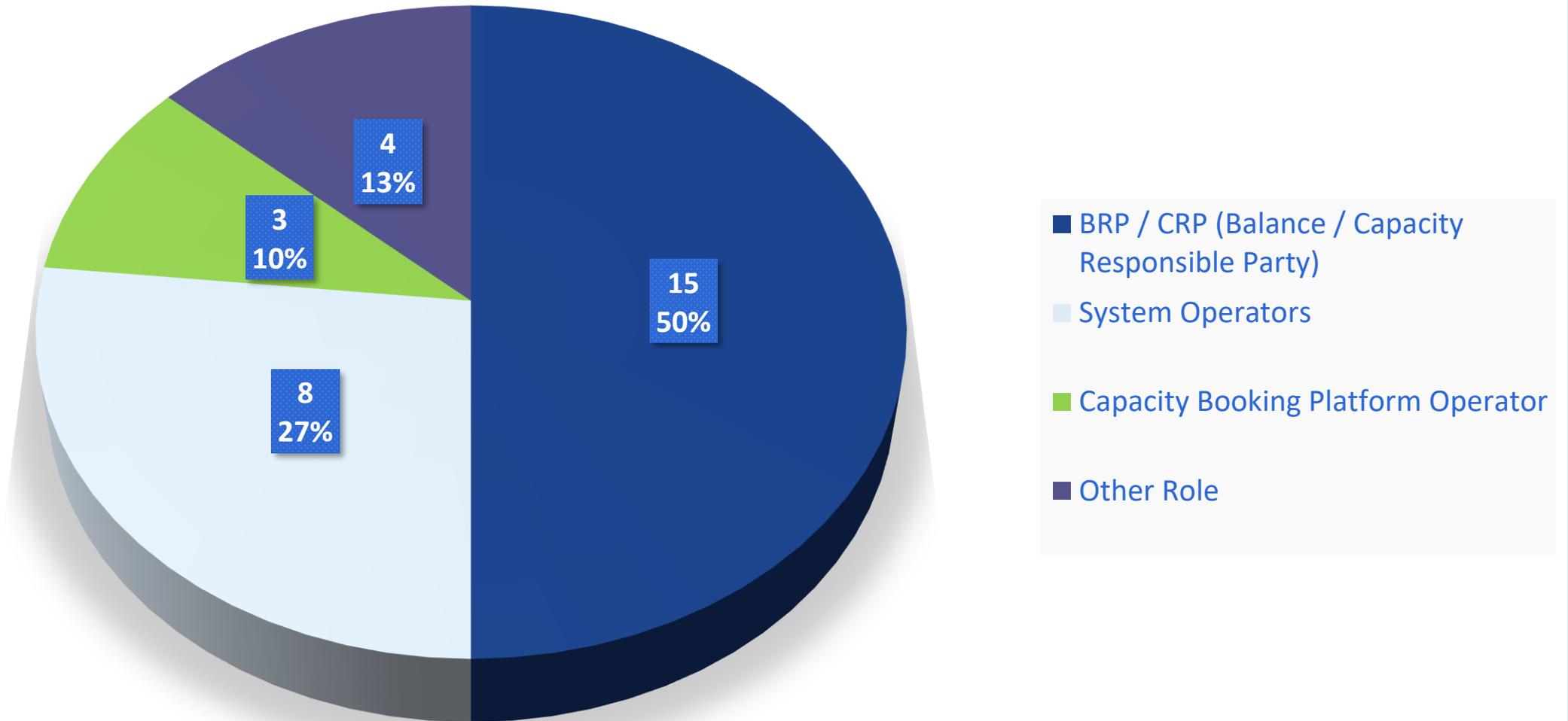
# Participants (Divided into 2 groups)



**9 30%**

**21 70%**
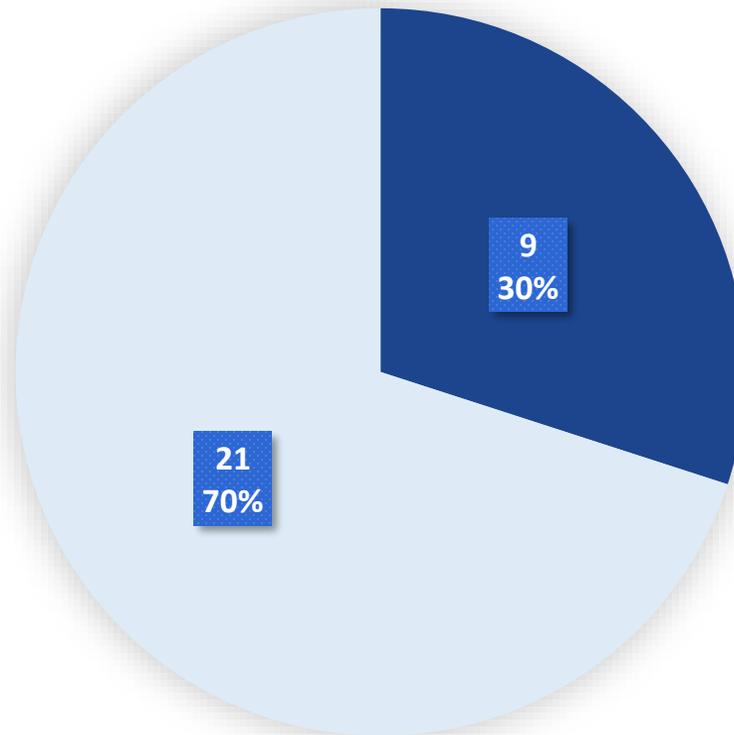
■ TSO / Capacity Booking Platform Operator   ■ BRP/CRP/LNG/SSO/Other Roles

## Other roles

− Producer

− Seller

− Software provider

− Shareholder

− Customer

# Used Formats



Chart legend: Edig@s 5.1 (dark blue), Edig@s 4 (light grey), Edig@s (Edifact) (green), Proprietary format (teal)
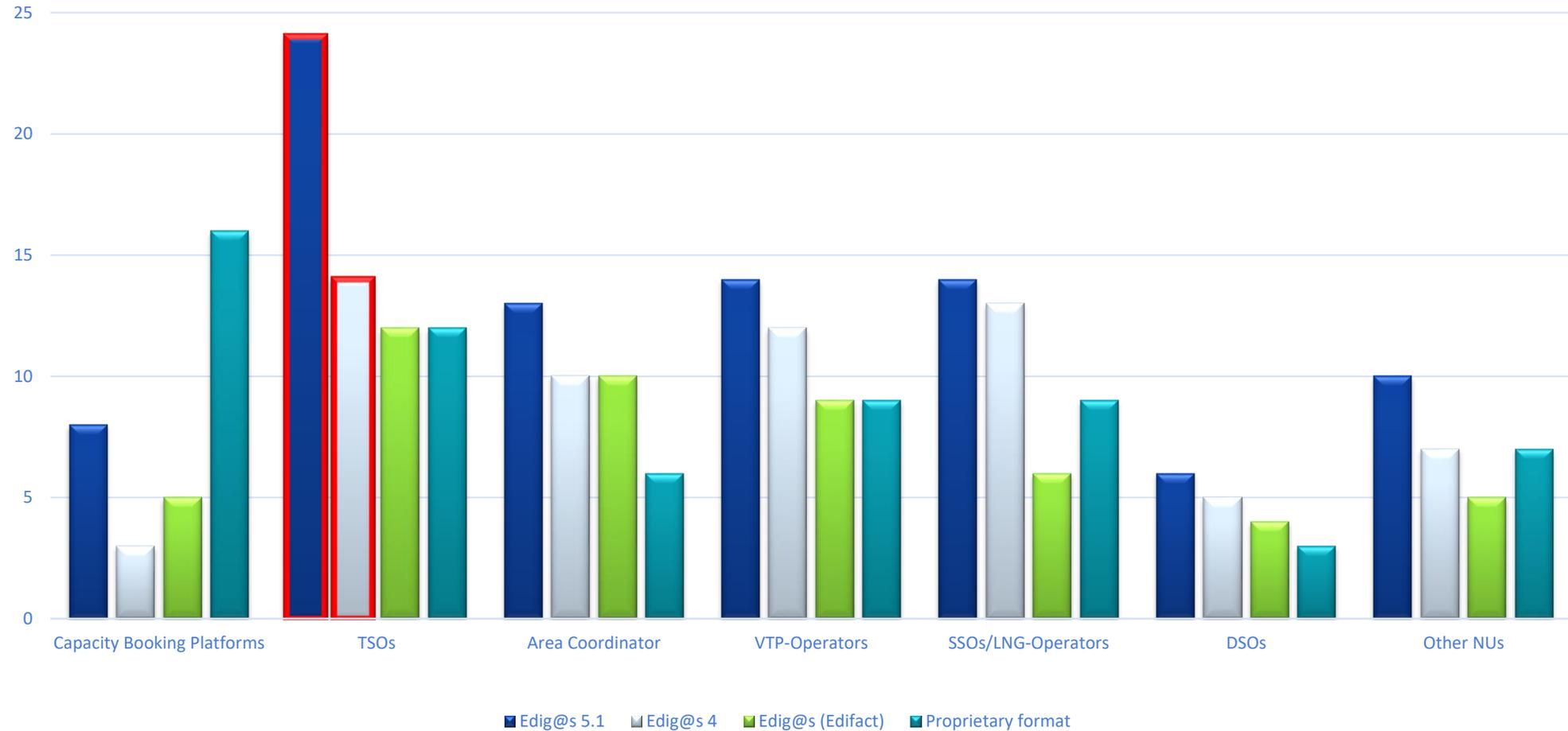
**The bars with a red outline are mandatory (INT NC / National regulation)**

# Used Protocols
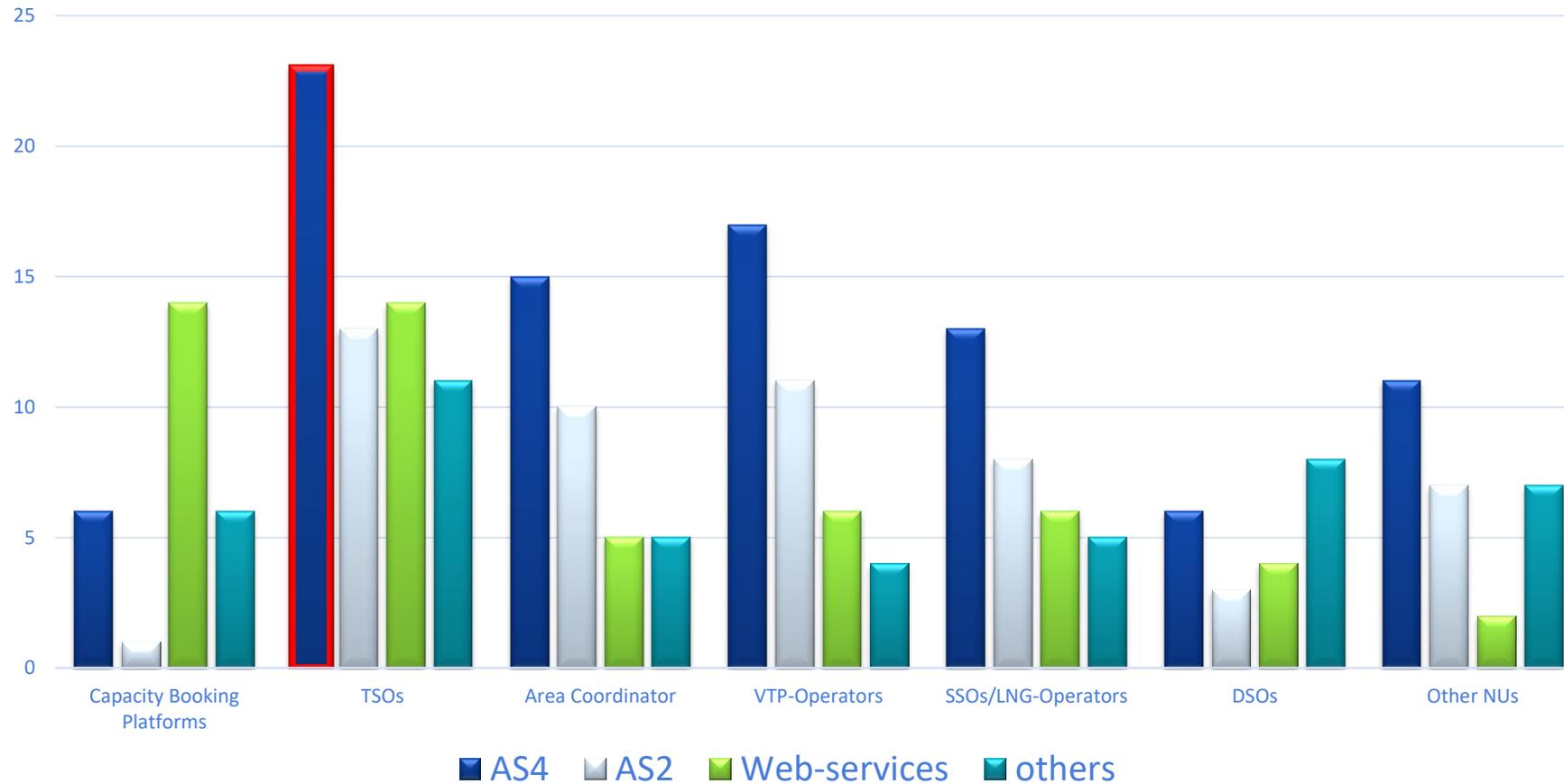


**The bars with a red outline are mandatory (INT NC / National regulation)**

# Support of Edig@s XML for Booking Platforms
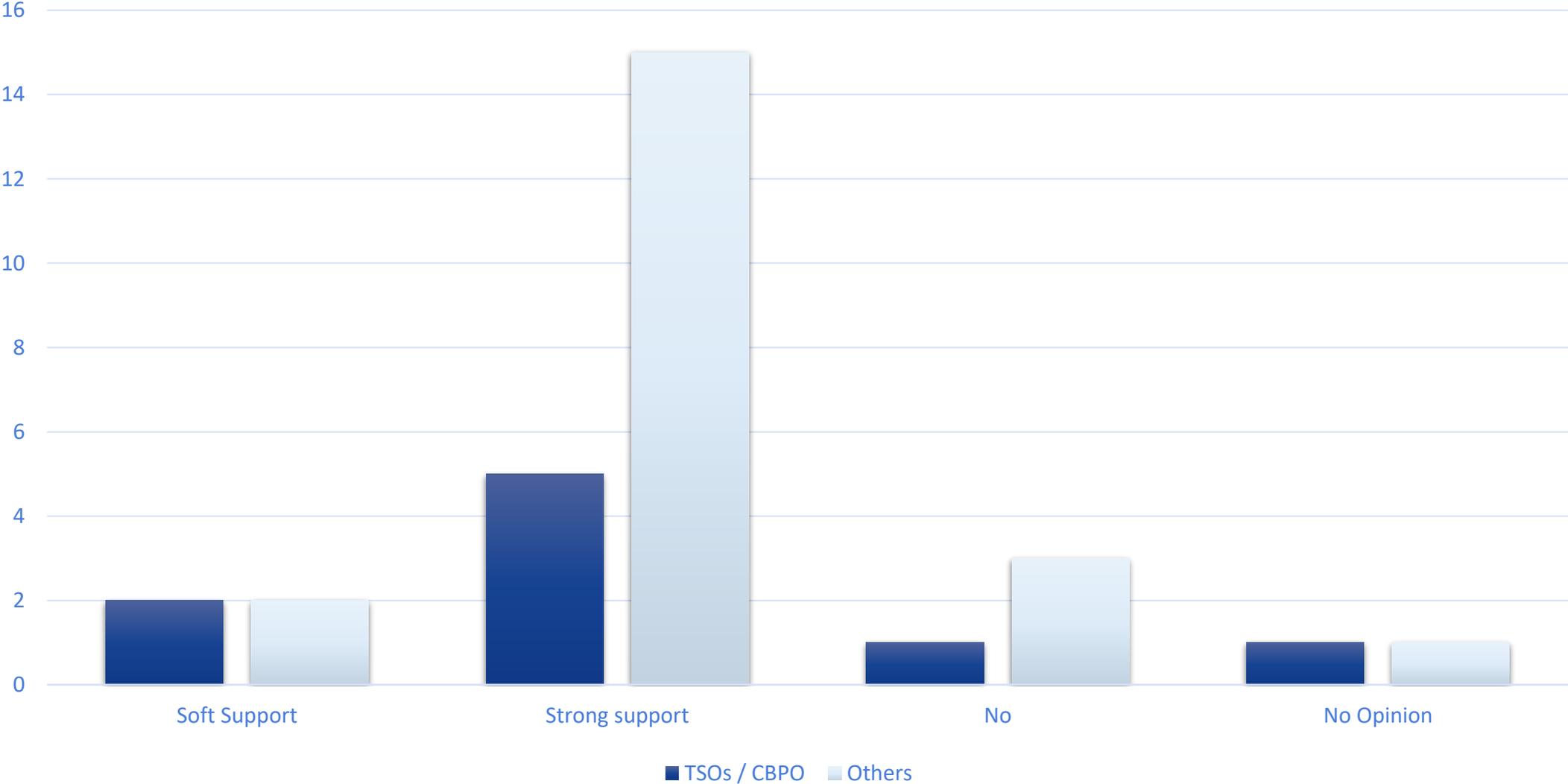
# Additional Edig@s functionalities



Chart legend: ■ TSO / CBPO  ☐ Others

X-axis categories:
- Only activities covered by the CAM NC (basic activities like auction bidding, auction results and information add some examples)
- Functionalities offered by capacity booking platforms, which are needed (additional activities like pulling balancing group information, pulling auction calendars etc.)
- Other
- No Answer

Comment to Others: There might arise new requirements therefore it would not be desirable to limit to specific functionality

Support a common protocol for all capacity booking platforms
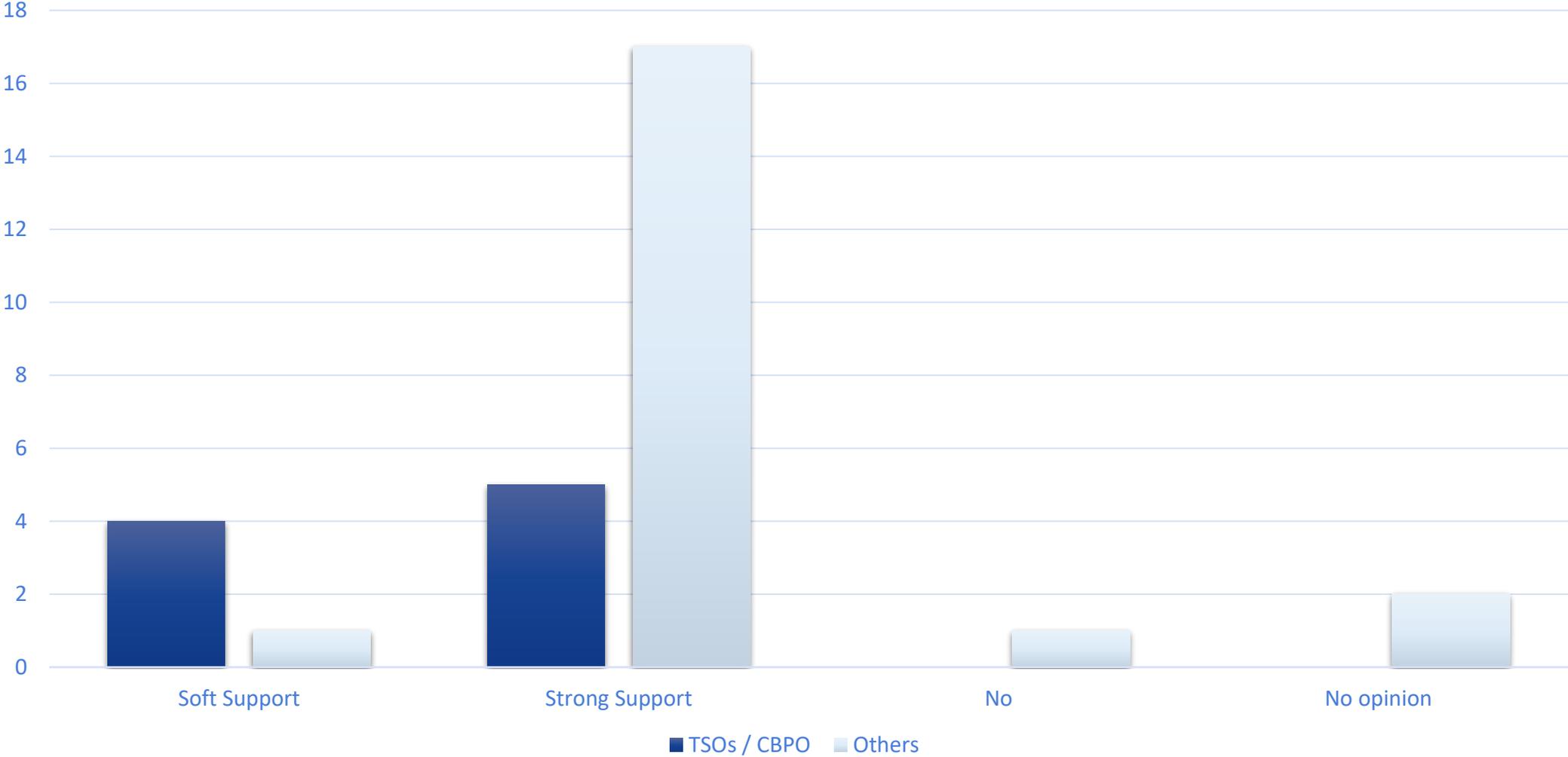
# Preferred protocol for communication to capacity booking platforms

AS4 (as defined in INT NC * Art. 21)   REST (as used by Prisma)

■ TSOs / CBPOs   ■ Others
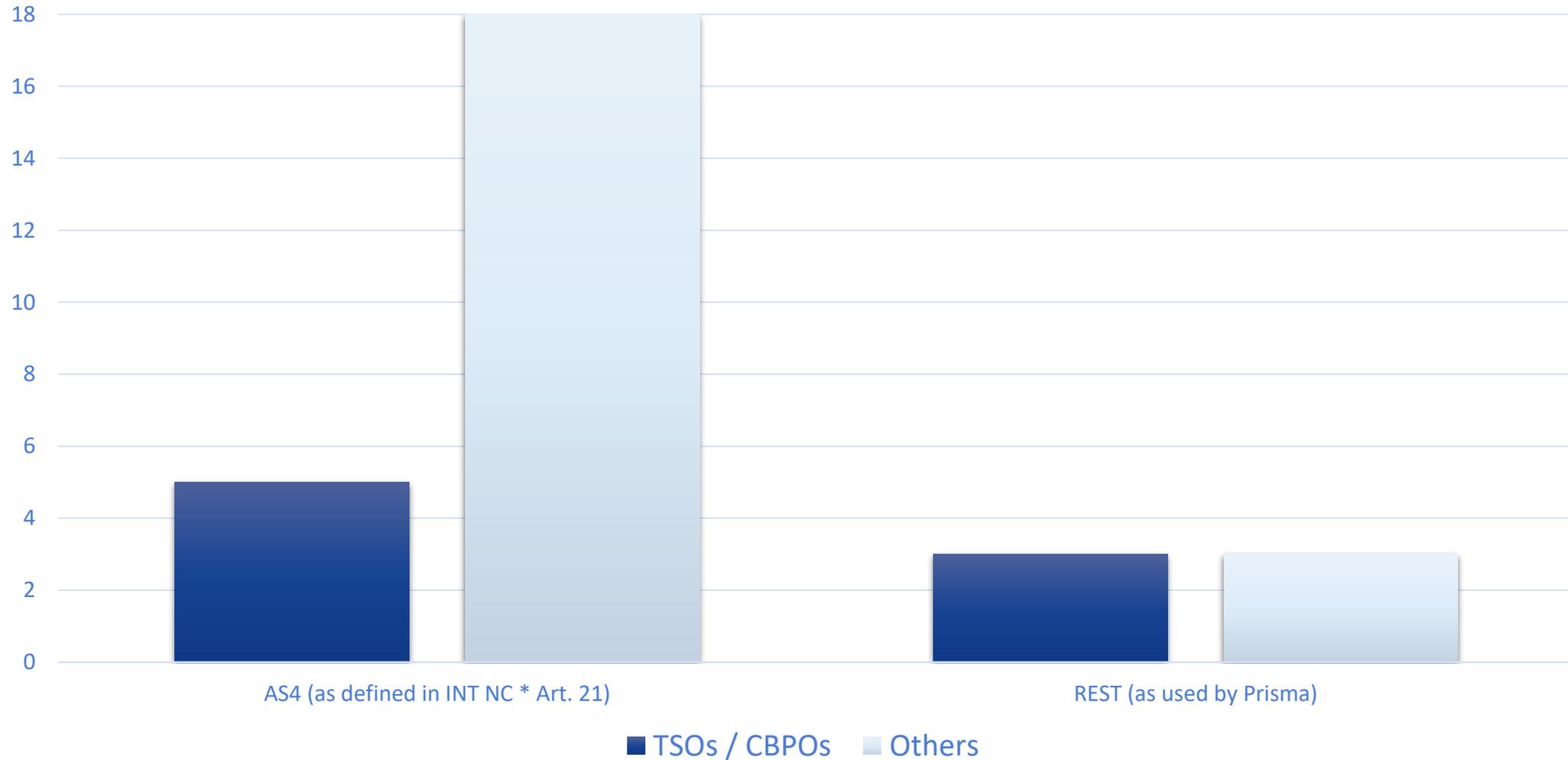
# Feedback regarding the questioned Protocols

| Protocol | Pros | Cons |
|---|---|---|
| **AS4** | • Interoperability (24)<br>• Security (Authentication) (22)<br>• Security (non-repudiation) (18) | • Speed of implementation (7)<br>• Speed reg. processing messages (4) |
| **REST** | • Speed while procession messages (10)<br>• Speed of implementation (9) | • Interoperability (12)<br>• Security (non-repudiation) (10)<br>• Security (Authentication) (9) |

- AS4 (following ENTSOG's definitions) was indicated as the protocol ensuring a high level of security aspects

- REST (as implemented by Prisma) was indicated as the protocol providing a faster initial implementation of the data exchange process

# For which processes do you have Edig@s XML / AS4 in place?



**The bars with a red outline are mandatory (INT NC / National regulation)**

# Would you want the existing method of data exchange to continue <u>despite</u> a common protocol is offered?



- 53% (16 out of 30) of the participants would like to continue with existing data exchange method
  - For a transitory period, existing method should be continued.
  - To keep backward compatibility/interoperability
  - The AS4 protocol is a heavy protocol requiring a middleware server running 24/7. This solution is not suitable for smaller companies and individual traders, that still want to automate their processes or connect new frontend implementations. A parallel, simpler and cheaper implementation is still needed to allow for stateless communication and information pulling without investments in the infrastructure. (Prisma, Thyssengas)
  - For a smooth transition, the cut-over period needs to be longer. (Swedegas)
  - Contingency in case of issues around implementation of new protocol.
  - The current [existing] method does not generate new costs (TAURON Polska Energia S.A.)
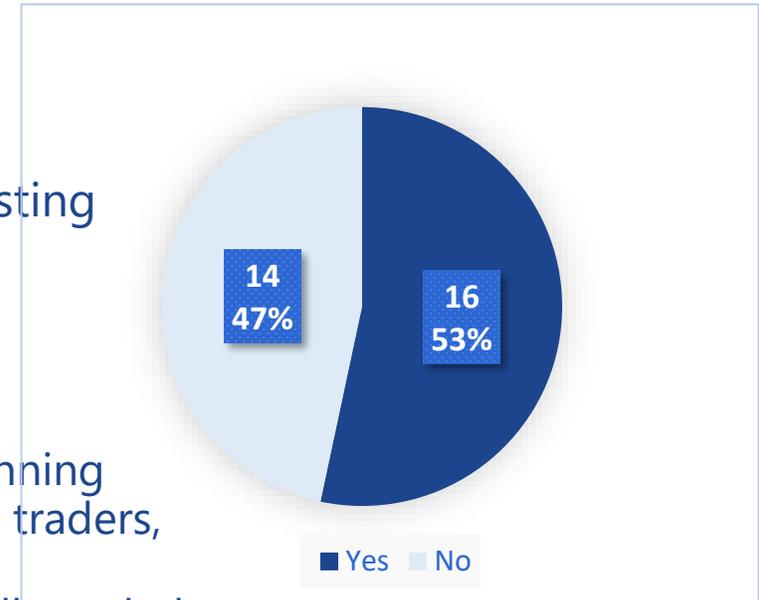
# Implementation time for a new format and protocol

## Format



**1 3%** · **14 47%** · **15 50%**
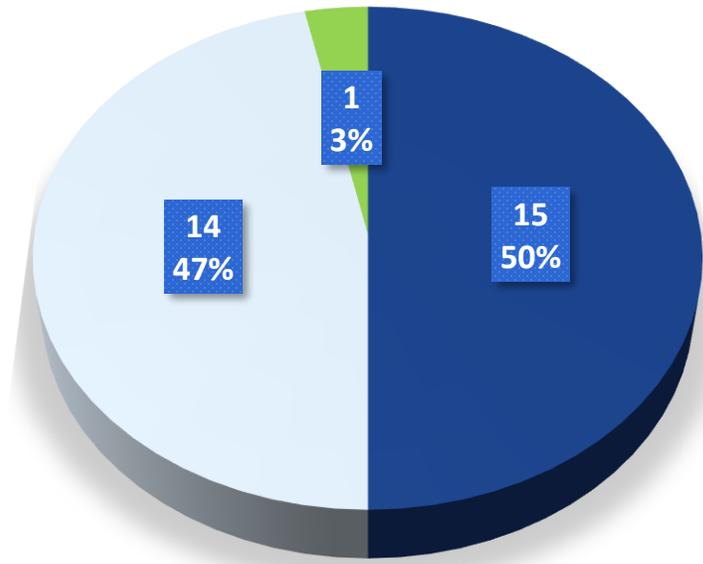
■ Less than 6 months ■ 1-2 years ■ 3+ years

## Protocol



**0%** · **15 50%** · **15 50%**
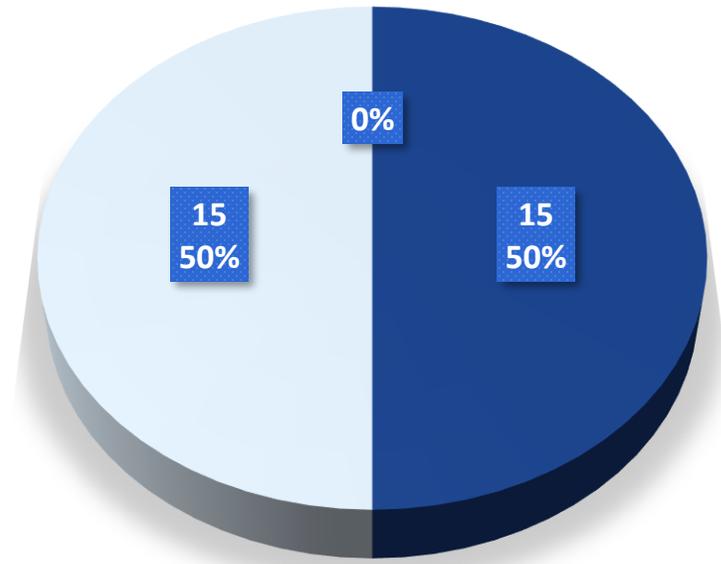
■ Less than 6 months ■ 1-2 years ■ 3+ years

– The implementation period for a new format and protocol was indicated by "less than 6 months" by 50% of the participants, the remaining participants could implement a new format and protocol within a period of 2 years

Remark: please note that this question is addressing the implementation of a new format/protocol in general

# How many Capacity Booking Platforms do you use?



Legend: 1 BP, 2 BP, 3 BP, 4 BP, Not Active on Booking Platforms

- 7 — 33% (1 BP)
- 1 — 5% (2 BP)
- 4 — 19% (3 BP)
- 7 — 33% (4 BP)
- 2 — 10% (Not Active on Booking Platforms)
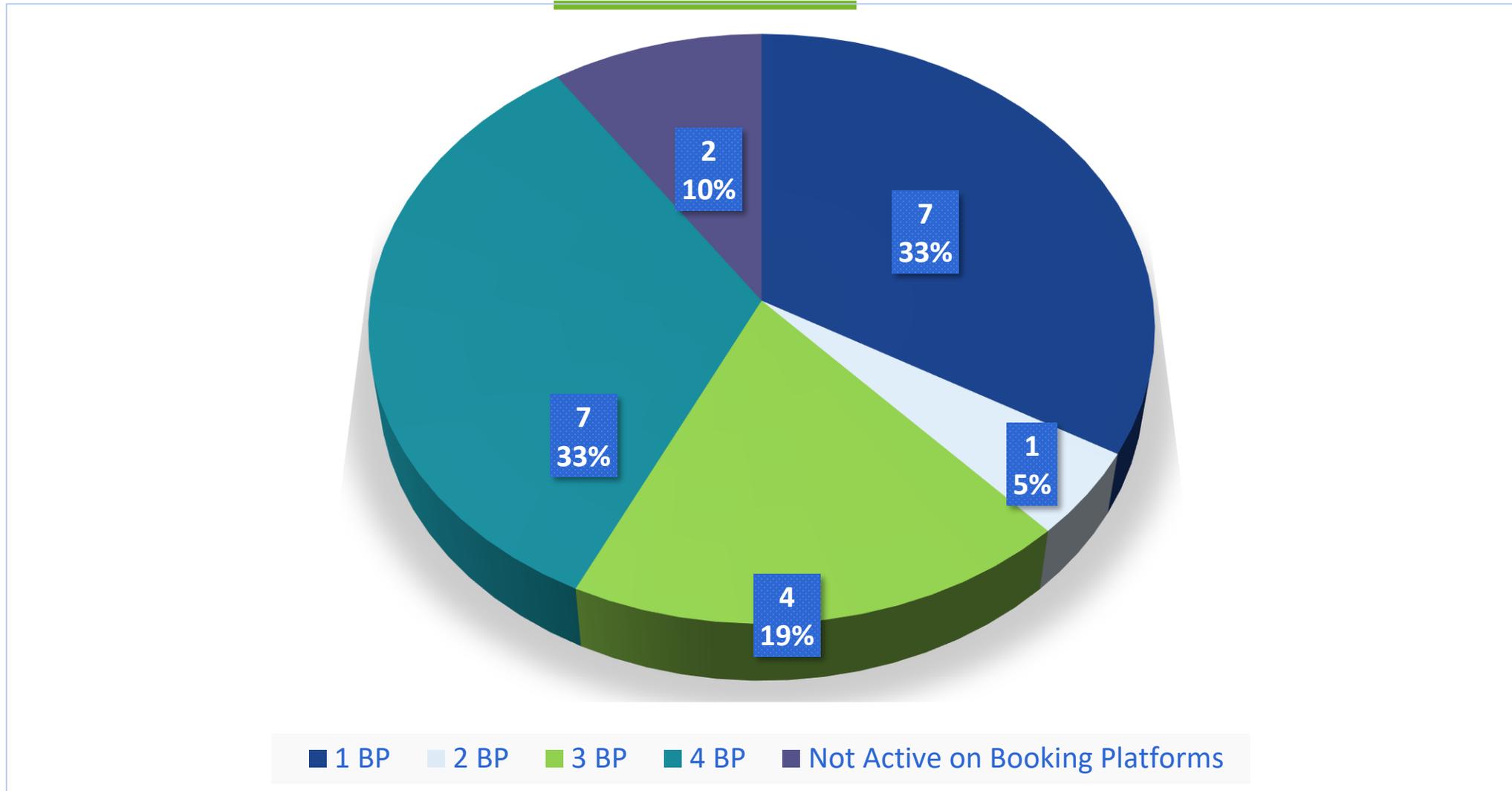
This evaluation does not consider TSOs & Platform Operators

# What are 3 the most important issues from your point of view regarding this reported issue?

- Costs (mentioned by 14 participant)

- One common standard (10)

- Harmonisation (7)

- Interoperability (6)

- Extract of the quotes supporting the above mentioned arguments:
  - Having unified messaging principle/approach would significantly reduce costs on implementation and complexity for operations / Different standards and methods currently used creates additional complexity
  - Likelyhood of errors and therefore costs/ Lack of common protocol / Ease of switching between platforms (Storengy UK)
  - Variety of protocols and formats to manage for a CRP / Increased IT costs (maintenance) (ENGIE SA)
  - Harmonization is needed. Using Edigas is the best way to harmonize. / Interfaces should not cost extra money as a fee, implementation/maintenance costs are sufficient. (VNG Handel & Vertrieb GmbH)

# What are 3 the most important issues from your point of view regarding this reported issue?

– Further arguments

  – It is important to maintain a level playing field for companies of different sizes. (Thyssengas, Prisma)

  – We should avoid slowing down development of new services and offerings. (Thyssengas, Prisma)

  – Cost and benefit in the context of the whole market should be considered. (Thyssengas, Prisma)

  – Mandating an AS4/Edigas.xml document based data exchange solution for capacity trading processes will improve our efficiency. It may also encourage TSOs who are currently resisting this solution for nominations and matching to finally adopt it. (RWE Supply & Trading GmbH)

  – Whilst an AS4/Edigas.xml document based data exchange solution for capacity trading processes now works for us, it may be overkill for some network users who book capacity infrequently, or in just one market. So the best solution could be to make it mandatory for those network users requesting it, but to keep the current interactive processes available for those network users who cannot justify document based data exchange. (RWE Supply & Trading GmbH)

# General Comments

| Topic | Quote | Remark |
|---|---|---|
| Edig@s | …lacks proper description/handbook in more easily readable format. Standard is good and paramount in any doubts, but without proper communication and explanation it is probably not sufficient as only source of reference. | The documentation is a compromise between high level information and technical description. Within v6 an improvement of the documentation has been undertaken |
| edig@s-XML/AS4 | Due to the use of this solution as a communication standard, its further development is highly recommended. | |
| Costs | The cost of additional interfaces in any format or protocol should be taken over by the party requesting it. Other market participants should not be contributing to the costs of services, which they are not using. | |
| | PRISMA right now earns money by offering an interface with XML files. That's why we exchange free emails. This new interface should be for free. Another way of funding needs to be found on the capacity platform side | |
| Legal aspect | Any change must result in a system that is fully compliant with applicable competition law, and an assessment should be made prior to implementation to ensure that this is the case. | AS4 and Edig@s XML are part of the INT NC. |

# Next Steps

- Publication of the results of the public consultation

- Draft of a solution for the reported issue

- Publication of the solution after approval by ENTSOG and ACER

- In case the solution would be to include data exchange between Network Users & Capacity Booking Platforms into the INT NC
  - Involvement of the EC by ENTSOG and ACER
  - Drafting an Amendment proposal by ENTSOG and ACER for of the INT NC for the EC

# Thank you for your attention

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