

Establishment of the annual priority lists for the development of network codes and guidelines for 2016 and beyond

Comments Spanish Gas Association

Tentative Annual Priority List 2016 regarding gas networks rules

1. Rules regarding harmonised transmission tariff structures (Commission continuing adoption phase)

1. We agree with the proposal.

2. Rules regarding an EU-wide market-based approach on the allocation of 'new build' gas transmission capacity (Commission continuing adoption phase of the amendment of the capacity allocation mechanisms network code),

2. We agree with the proposal.

3. Rules regarding forthcoming CEN standard on H-gas quality (draft amendment proposal to the network code on interoperability and data exchange rules and start Commission adoption phase).

The European Committee for Standardisation (CEN) was mandated by the Commission in 2007 to draw up harmonised standards for H-gas quality in the EU. This mandate should be concluded by the end of 2015. The amendment proposal would integrate the forthcoming CEN standard into European law making the respective, agreed CEN parameters binding on an EU level. The amendment proposal will not include Wobbe index parameters (which are not included in the draft standard either) as still more analysis on the precise effects of the Wobbe index bands and index variations on appliances (household and industrial) is needed. For further information on the outcomes and public consultation of CEN on the gas quality please visit DG Energy's website:

<http://ec.europa.eu/energy/en/topics/markets-and-consumers/wholesale-market/gas-quality-harmonisation>

The standard for H-gas quality in the EU, which will be published by the end of 2015, does not include the Wobbe index within the list of parameters. However, this parameter is the main one for interchangeability.

1. The European Commission has already expressed its support to the continuity of the works on this issue in order to include the Wobbe index in a future revision of the European standard.
2. For this reason, we recommend waiting until there is a common understanding on the Wobbe index range at European level and a new version of the standard is published.

3. The EC analysis should assess the impact of gas quality variations on existing gas applications but also the impact of the Wobbe index range on existing contracts and diversification of supply. Too narrow limits imply real risks for the establishment of diversified and competitive portfolio of European suppliers and could be against a meaningful European LNG strategy, besides the fact that it would favor some sources to the detriment of others. For instance, in case of a reduced upper limit, LNG supplies from USA and from other potential LNG suppliers could be off specification.
4. Regarding the rest of the parameters, there is a wide consensus on the proposed ranges, as they are close to the national specifications.
5. Finally, before taking the decision of amending the network code on interoperability and data exchange rules, which will apply from 1 May 2016, the result of the implementation/application of the Chapter IV "GAS QUALITY AND ODOURISATION" of the NC should be evaluated.

4. Additional Comments

1. We have not identified additional key areas for the development of harmonized gas rules to be included on the annual priority list neither for 2016 nor beyond 2016.
2. One of the few areas mentioned in Article 8.6 of the Regulation (EC) 715/2009 which has not been tackled yet is *(1) energy efficiency regarding gas networks*. However, we would not recommend the development of such a Network Code, since the content may be already covered by the Directive 2012/27/EU. We would like to highlight that the Directive 2012/27/EU of the European Parliament and of the Council, of 25 October 2012, on energy efficiency is currently under implementation by the Member States.