

Response statistics for 'Public Consultation on the modification of Congestion Management Procedures in the gas sector'

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All data requested

Result pages

▶ There are 58 responses matching your criteria of a total of 58 records in the current set of data.

Sorted answers Original order

IDENTIFICATION

Your profile -single choice reply- (compulsory)			
	Number of requested records	Requested records (58)	% of total number records (58)
 Organisation	52	(89.7%)	(89.7%)
 Public authority	6	(10.3%)	(10.3%)
 Citizen	0	(0%)	(0%)

A. GENERAL QUESTIONS

A.1. General application and capacity calculation

A.1.1. Implementation of the same rules at all interconnection points. Please assess how broadly any new rule on congestion management should apply. -single choice reply- (compulsory)



	Number of requested records	Requested records (58)	% of total number records (58)
Congestion management is congestion prevention; therefore the same framework should apply in all cases irrespective of whether an interconnection point is currently congested or not.	29	(50%)	(50%)
The respective National Regulatory Authority ("NRAs") should continuously assess whether congestion exists and shall apply EU-wide rules on a case by case basis, only when congestion arises.	29	(50%)	(50%)
I don't know	0	(0%)	(0%)

A.1.2. Calculation of maximum available capacity. Please provide your assessment of the different possible ways to assure that maximum capacity is made available by Transmission System Operators ("TSOs"). -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
The general obligation of Art. 16 of the Gas Regulation (EC) 715/2009 to make available maximum capacity is sufficient. No additional provision at EU level is needed.	17	(29.3%)	(29.3%)
Further specification of Art. 16 of the Gas Regulation (EC) 715/2009 as regards the specific obligation to use transparent methodologies and best available and cost-efficient procedures to assure that TSOs across the EU offer the maximum available capacity is necessary.	36	(62.1%)	(62.1%)
The maximum amount of available capacity should be calculated according to specifically formulated, common standards across the EU and the TSOs should be compelled to calculate precisely according to those standards.	5	(8.6%)	(8.6%)
I don't know	0	(0%)	(0%)

A.2. Nomination time

A.2.1. Do you think that it is necessary to harmonize nomination times in general between Member States? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
No harmonization is necessary, the current system works well	4	(6.9%)	(6.9%)
 Yes, harmonization may be necessary within regions or at interconnection points of certain Member States	29	(50%)	(50%)
 Yes, it is necessary to have full harmonization of nomination times across the EU	22	(37.9%)	(37.9%)
I don't know	3	(5.2%)	(5.2%)

A.2.2. As regards initial day-ahead nominations, is there a particular time on any given day by which network users are able to fairly well predict their transmission capacity needs for the day-ahead? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	27	(46.6%)	(46.6%)
No	15	(25.9%)	(25.9%)
I don't know	16	(27.6%)	(27.6%)

A.2.5 Can within day (initial) nominations always take place at one precise time of the day? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	11	(19%)	(19%)
No	22	(37.9%)	(37.9%)
I don't know	25	(43.1%)	(43.1%)

B. TRANSPARENCY AND TRADING

B.1. Enhanced transparency in order to improve the value and predictability of interruptible capacities

B.1.1. In line with Commission decision 2010/685/EU of 10 November 2010, transparency would be further improved to increase the reliability and predictability of interruptible capacities. Network users would have access to more accurate information and real time information on bookings and nominations, in combination with good historic data. -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Transparency requirements pursuant to Commission decision 2010/685/EU will already improve the situation by increasing predictability of gas flows, helping network users to better assess the risk of interruption. No further operational transparency measures are needed.	44	(75.9%)	(75.9%)
Additional operational transparency measures are needed.	11	(19%)	(19%)
I don't know	3	(5.2%)	(5.2%)

B.2. Enhanced secondary market

B.2.1. The secondary capacity market could be stimulated by the establishment of capacity trading platforms, bulletin boards, coordinated sales mechanisms, etc. -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Further enhancement of the secondary market would solve all capacity congestion issues	12	(20.7%)	(20.7%)
While necessary in its own right, further enhancement of the secondary market would not solve all capacity congestion issues. Therefore specific measures need to be put in place with respect to capacity utilization.	41	(70.7%)	(70.7%)
I don't know	5	(8.6%)	(8.6%)

C. SHORT-TERM DAY-AHEAD CONGESTION MANAGEMENT PROCEDURES

C.1. "Use it or sell it"

Instead of a "use-it-or-lose it" mechanism a "use it or sell it" mechanism could be put in place, allowing for compensation through sales of unused capacity while at the same time imposing sanctions for not selling in case of non-utilisation (i.e. a non-utilisation penalty).

C.1.1. Please select between the below options

-single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
A "use-it-or-sell-it" mechanism would be an effective alternative to the "use-it-or-lose it mechanism	26	(44.8%)	(44.8%)
A "use-it-or-sell-it" mechanism would not be an effective alternative to the "use-it-or-lose it" mechanism as it does not directly result in unused capacity being freed up and offered to the market.	20	(34.5%)	(34.5%)
I don't know	12	(20.7%)	(20.7%)

C.2. Firm day-ahead "use it or lose it": General questions

According to this option, the principle of initial day-ahead nomination and re-nomination intra day as currently applied in most systems would be left unchanged. However, the initial day-ahead nomination would be made partially binding, resulting in some limitations of the network users' re-nomination right. This would leave some firm capacity available on the market for (new) network users.

C.2.1. Rights to day-ahead firm capacity facilitate market entry and effective competition in a better way than rights to interruptible capacity -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
I agree	34	(58.6%)	(58.6%)
I disagree as in my view firm and interruptible capacities are equally effective to market players.	9	(15.5%)	(15.5%)
I don't know	15	(25.9%)	(25.9%)

C.2.2. The freeing up of and subsequent offering/allocation of day-ahead firm capacity (as opposed to interruptible) will lead to improved capacity utilisation -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
I agree	25	(43.1%)	(43.1%)
I disagree	14	(24.1%)	(24.1%)
I don't know	19	(32.8%)	(32.8%)

C.2.3. Limited re-nomination rights will increase day-ahead firm capacity offer -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	29	(50%)	(50%)
No, only fully binding nominations (e.g. no re-nomination rights) will increase day-ahead firm capacity offer.	5	(8.6%)	(8.6%)
I don't know	24	(41.4%)	(41.4%)

C.2.4. Limited re-nomination rights are likely to induce counterproductive strategic bookings by network users in order to ensure sufficient re-nomination rights -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	27	(46.6%)	(46.6%)
No	6	(10.3%)	(10.3%)
I don't know	25	(43.1%)	(43.1%)

C.2.5. The limited flexibility stemming from limited re-nomination rights could, if necessary, be alleviated by trading on the within day markets -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
I agree	27	(46.6%)	(46.6%)
I disagree	21	(36.2%)	(36.2%)
I don't know	10	(17.2%)	(17.2%)

C.3. Firm day-ahead "use it or lose it": Limitation of re-nomination

Limitation of re-nomination upwards could be designed in a way allowing a network user to still make use of 50% of the remaining difference between booked and initially nominated capacity. The remainder of booked capacity could be re-nominated only on an interruptible basis.

Limitation of re-nomination downwards could be designed in a way allowing a network user to make a reduction of 50% of the initial nomination, to prevent excessively high, initial nomination. Re-nomination downwards could be completely prohibited when the initial nomination is of 90% or more of the booked capacity.

C.3.1. Do you think that limiting upward and downward re-nominations to a flexibility range of 50% (expressed as a share of the difference between initially booked and subsequently nominated capacity) would give capacity holders sufficient scope to re-nominate while at the same time allow binding capacity to be made available in case of congestion? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	12	(20.7%)	(20.7%)
No	35	(60.3%)	(60.3%)
I don't know	11	(19%)	(19%)

C.3.3. Prohibition of re-nomination downwards when initial nomination is equal or over 90% would allow keeping a small band of day-ahead capacity available in most cases and would prevent blocking behaviours, which could take shape through a pattern of abusively high day-ahead nominations with subsequent re-nominations downwards -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	12	(20.7%)	(20.7%)
No	26	(44.8%)	(44.8%)
I don't know	20	(34.5%)	(34.5%)

C.4. Firm day-ahead "use it or lose it": Exceptional circumstances


Finally, in exceptional circumstances where the limitation of re-nomination rights could interfere negatively with the electricity market, or could undermine network stability or security of supply, the NRA could be allowed to give more extensive re-nomination rights to a network user who would request so. This exemption would be submitted to an annual revision.

A cascaded system of initial nomination/allocation of day-ahead firm capacity and subsequent nomination/re-nomination/and intra day ad hoc firm / interruptible nominations could thus ensure an efficient utilisation of existing capacity.

C.4.1. The NRA should be entitled to grant exemptions in exceptional circumstances and within the limits of an annual revision -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	34	(58.6%)	(58.6%)
No	17	(29.3%)	(29.3%)
I don't know	7	(12.1%)	(12.1%)

C.4.2. Are there any scenarios where the interaction of nomination, re-nomination and possible exemption would not be sufficient to guarantee the security of supply or the integrity of the electricity market? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
 Yes	29	(50%)	(50%)
No	2	(3.4%)	(3.4%)
I don't know	27	(46.6%)	(46.6%)

C.5. Capacity oversubscription and buy-back incentive scheme

In an oversubscription scheme, the TSO could, on the basis of statistic scenarios about the probable amount of unused booked capacity, be allowed to make available on the market an extra amount of capacity and therefore to oversubscribe the existing physical capacity. A buy-back mechanism could ensure that the TSO will tender to buy back capacity in case of actual or potential physical congestion.

The NRA could set the proportion of additional capacity to be made available, and could determine a financial incentive scheme allowing the TSO to optimise capacity oversubscription.

C.5.1. Do you consider a capacity oversubscription and buy-back incentive scheme to be an effective congestion management scheme? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	38	(65.5%)	(65.5%)
No	10	(17.2%)	(17.2%)
I don't know	10	(17.2%)	(17.2%)

C.5.2. Do you consider a capacity oversubscription and buy-back incentive scheme to be an alternative to partially binding day-ahead nominations or a possible add-on? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Alternative	27	(46.6%)	(46.6%)
Possible add-on	17	(29.3%)	(29.3%)
Neither	9	(15.5%)	(15.5%)
I don't know	5	(8.6%)	(8.6%)

C.5.3. Do you consider that the decision to implement a capacity oversubscription and buy-back incentive scheme should be made on the level of each interconnection point, on the national, the regional or the EU level? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Interconnection point	19	(32.8%)	(32.8%)
National	6	(10.3%)	(10.3%)
Regional	2	(3.4%)	(3.4%)
EU	14	(24.1%)	(24.1%)
I don't know	17	(29.3%)	(29.3%)

C.5.4. How should the rights associated with the buy-back mechanism be defined? -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
The rights associated with the buy back mechanism should be defined by NRAs.	29	(50%)	(50%)
The rights associated with the buy back mechanism should be defined directly in the annex of Regulation (EC) 715/2009.	21	(36.2%)	(36.2%)
I don't know	8	(13.8%)	(13.8%)

D. Long term Congestion Management Procedures

D.1. Surrender of booked capacity

TSOs could be forced to accept capacity surrendered by network users insofar as contractual congestion exists. The NRA would have to approve the terms and conditions for surrendering capacity and the methods of rewarding initial capacity holders for the capacity sold.

D.1.1. What is your view of such a mechanism? -single choice reply- (compulsory)			
	Number of requested records	Requested records (58)	% of total number records (58)
This mechanism is an efficient way to make more capacity available on the market for new network users.	27	(46.6%)	(46.6%)
It is not needed, as it would merely duplicate the function of secondary markets.	24	(41.4%)	(41.4%)
I don't know	7	(12.1%)	(12.1%)

D.1.2. Who in your view should decide on the modalities of such a system? -single choice reply- (compulsory)			
	Number of requested records	Requested records (58)	% of total number records (58)
The modalities are to be established at the NRA level.	22	(37.9%)	(37.9%)
EU-wide harmonisation of modalities is needed.	32	(55.2%)	(55.2%)
I don't know	4	(6.9%)	(6.9%)

D.2. Strict long-term use-it-or-lose-it

NRAs could strictly monitor the individual capacity utilisation rates by each network user over a long period of time. Where utilisation patterns would reveal a case of capacity hoarding, the NRAs could take the necessary steps and withdraw all or part of the unused capacity from the network user and the TSO would reallocate it to the market.

The powers of the NRA would be subject to strict preconditions. Capacity could be withdrawn only when systematically underutilised, i.e. when:

- 1 network users request capacity bookings at the particular interconnection point and are unable to obtain this capacity on the primary or secondary market, and
- 1 the capacity holder systematically underutilises at least part of its allocated capacity with a contract duration of more than one year during a specific period covering at least one winter month, and
- 1 the capacity holder has not sold or offered in due time and at a reasonable price its unused capacity and
- 1 the capacity holder is unable to satisfactorily justify its behaviour. The application of a short-term use-it-or-lose-it mechanism shall not be regarded as justification for the purpose of long-term use-it-or-lose-it.

D.2.1. According to this scenario -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Long-term use-it-or-lose-it as proposed above will solve most contractual congestion problems.	15	(25.9%)	(25.9%)
It can only serve as a potential sanction and will probably never be used.	20	(34.5%)	(34.5%)
This mechanism undermines the position of the network users.	14	(24.1%)	(24.1%)
I don't know	9	(15.5%)	(15.5%)

D.3. Capacity withdrawal from dominant players or capacity "reset"

According to this last proposal, all capacities booked by dominant players could be withdrawn and reallocated on the market.

D.3.1. This proposal would be an adequate solution to remedy contractual congestion -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
 Yes	16	(27.6%)	(27.6%)
No	35	(60.3%)	(60.3%)
I don't know	7	(12.1%)	(12.1%)

D.3.2. Such a measure would resolve contractual congestion for a short time before the previous situation would re-occur -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	12	(20.7%)	(20.7%)
No	19	(32.8%)	(32.8%)
I don't know	27	(46.6%)	(46.6%)

D.3.3. Such a measure would dangerously undermine the rights and the business of existing network users -single choice reply- (compulsory)

	Number of requested records	Requested records (58)	% of total number records (58)
Yes	37	(63.8%)	(63.8%)
No	9	(15.5%)	(15.5%)
I don't know	12	(20.7%)	(20.7%)