

**OPINION OF THE AGENCY FOR THE COOPERATION OF ENERGY  
REGULATORS No 18/2013**

**of 10 September 2013**

**ON THE DRAFT COMMUNITY-WIDE TEN-YEAR NETWORK  
DEVELOPMENT PLAN 2013-2022 SUBMITTED BY ENTSOG**

THE AGENCY FOR THE COOPERATION OF ENERGY REGULATORS,

HAVING REGARD to Regulation (EC) No 713/2009 of the European Parliament and of the Council of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators<sup>1</sup> (hereinafter referred to as “the Agency”), and, in particular, Article 6(3)(b) thereof;

HAVING REGARD to Regulation (EC) No 715/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the natural gas transmission networks and repealing Regulation (EC) No 1775/2005<sup>2</sup> and, in particular, Articles 8(3)(b) and (10) and 9(2) thereof;

HAVING REGARD to the favourable opinion of the Board of Regulators of 6 September 2013, delivered pursuant to Article 15(1) of Regulation (EC) No 713/2009,

WHEREAS:

- (1) Pursuant to Article 8(3)(b) of Regulation (EC) No 715/2009, the European Network of Transmission System Operators for Gas (hereinafter referred to as “ENTSOG”) shall adopt a non-binding Community-wide ten-year network development plan (hereinafter referred to as “TYNDP”), including a European supply adequacy outlook, every two years;
- (2) Pursuant to Article 9(2) of Regulation (EC) No 715/2009, ENTSOG shall submit the draft TYNDP including the information regarding the consultation process to the Agency for its opinion;
- (3) On 10 July 2013, ENTSOG submitted the draft TYNDP 2013-2022 to the Agency for its opinion,

HAS ADOPTED the present Opinion on ENTSOG’s TYNDP 2013-2022, with the following comments and guidance:

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<sup>1</sup> OJ L 211, 14.8.2009, p. 1.

<sup>2</sup> OJ L 231, 28.8.2009, p. 36.

## 1. Main findings

- 1.1. The Agency acknowledges the need for accurate, complete and up-to date information as a requisite for the preparation of the TYNDP and the assurance of its relevance and trustworthiness. The Agency appreciates the introduction by ENTSOG of an on-line project data collection system, in the context of a well organised, inclusive stakeholder consultation process. The Agency believes that the upgrading of the existing Transparency Platform by ENTSOG could further contribute to the reliability of the TYNDP process. In order to ensure that the scope of the TYNDP meets its role as a policy instrument under Regulation (EU) No 347/2013 of the European Parliament and of the Council of 17 April 2013 on guidelines for trans-European energy infrastructure<sup>3</sup>, the Agency believes that in the preparation of the TYNDP physical system-related data (for example, capacity) should be complemented by data regarding various aspects of the commercial use of the system, for example actual (flow-based) capacity utilisation rates.
- 1.2. The Agency notes the upgrade of the top-down modelling of the physical gas flows and supply sources which ENTSOG has put in place, and welcomes the modelling of multiple demand and supply disruption cases. The Agency invites ENTSOG to further develop the model to the level of flow and capacity assessments at individual interconnection points between entry-exit zones within the European Union, with actual flows and non-physical (commercial) barriers accounted for in the model. The Agency stresses the need to validate the modelling tool by carrying out model runs with actual historic data and by peer review of the modelling results of actual data runs.
- 1.3. The Agency welcomes the assessment of the supply adequacy and the infrastructure resilience, accompanied by an analysis of the supply source dependency, the network adaptability to supply evolution, and the capability for supply diversification at zone (country) level. The Agency finds it useful that the results regarding remaining flexibility and identified potential investment gaps are complemented by potential remedies and their impact on the system resilience.
- 1.4. The Agency notes that the current TYNDP modelling is mostly based on the physical capabilities of the European gas network as a whole. In modelling terms, the assumption is that of a “cooperative game” in which the existence is presupposed of a “team” consisting of a European shipper (gas importer) and a European TSO, who use an integrated gas network in which only capacity constraints are encountered. Furthermore, in the flow and network assessments an abstraction is made of any locational price signals and price differentials. The Agency believes that, in order to achieve a better understanding of the gas infrastructure needs, non-physical constraints should be better integrated in the TYNDP modelling, so that not only physical investment gaps could be identified, but also investment gaps which should be resolved in pursuit of better EU-wide market functioning and market integration are highlighted.
- 1.5. The Agency notes that the current TYNDP modelling delivers a scenario, rather than a programme of investments, since the TYNDP provides no assessment of

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<sup>3</sup> OJ L 115, 25.4.2013, p. 39.

whether the investment projects submitted by project promoters are required to achieve important goals at European level. The Agency recommends the enlargement of the scope of future TYNDP assessments by including a review of the importance of individual investments projects submitted by promoters for achieving EU-wide and regional goals, including those defined in Regulation (EU) No 347/2013, and a cost-benefit analysis, and covering all Member States.

- 1.6. The Agency notes that the Supply Adequacy Outlook does not identify a lack of supply on an aggregated European level considering the gas demand curve used by ENTSOG. Consequently, the Agency invites ENTSOG to provide clarifications regarding the expected net benefits of constructing new and expanding existing infrastructure, given the gas supply and demand balance provided in the Supply Adequacy Outlook.
- 1.7. The Agency notes that under the reference cases of the final investment decision (FID) cluster, the overall remaining flexibility improves during the first 5 years and remains stable over the following five years, mainly due to a larger number of FID projects and lower demand. The resilience modelling identifies four Member States (zones) where the remaining flexibility (in case of very high daily demand) would fall below 1% of entry capacity. In case of simultaneous disruptions of gas supply from different sources, even more countries would be in stressful gas supply situations. In both instances, the TYNDP identifies investment gaps. The Agency appreciates the identification of the investment gaps and ENTSOG's suggestions of potential remedies, accompanied by an assessment of their contribution to investment gap mitigation.
- 1.8. The Agency notes that the number of FID projects in the TYNDP 2013-2020 is less than half compared to the number of such projects listed in the TYNDP 2011-2020. The Agency invites ENTSOG to provide an evaluation of the implementation of the previous TYNDP projects and to identify the main reasons for the steep reduction of FID projects.
- 1.9. The Agency appreciates ENTSOG's assessment of "external" barriers to infrastructure investments and the provision of a review of potential solutions which could lead to the reduction of these barriers. The Agency would expect ENTSOG to consider in future TYNDPs potential issues specific to TSOs themselves, which could impose "internal" barriers and risks to the efficient management of the gas transportation system, particularly in the light of achieving the goals of the internal energy market. The Agency recommends a reshaping of the TYNDP modelling methodology and tool, in order to incorporate "external" constraints and price signals adequately and enable the assessment of investment gaps from a more realistic view point, one in which non-physical constraints and price signals are of the essence; otherwise, in the Agency's opinion, many important aspects of fundamental European objectives, such as the ability of the gas network to support effective competition and market integration in pursuit of an efficient internal EU-wide gas market, would remain beyond the TYNDP scope of work.
- 1.10. The Agency appreciates ENTSOG's awareness of challenges facing the proposed projects of common interest (PCI) and of ENTSOG's obligation to develop an energy system-wide cost-benefit analysis (CBA) methodology. The Agency invites ENTSOG to share with stakeholders its views on how the CBA

methodology should be applied in the process of developing the next TYNDP, in coordination with other infrastructure development tasks, and seek relevant input from stakeholders regarding these issues. The Agency invites ENTSG to analyse the contribution of the PCI candidate projects to the development of the European transmission network, in order to include in the relevant TYNDP those projects which are necessary for the proper functioning of the European gas system, since, for the next PCI selection round, in order to be considered as PCIs, candidates need to be included in the TYNDP. The Agency also invites ENTSG to consider that a sound CBA methodology will not only be of key importance for selecting PCIs, but also for the purposes of cost allocation and financing under the provisions of Regulation (EU) No 347/2013.

- 1.11. The Agency believes that enhanced transparency and consistency are needed between the complementary gas infrastructure investment plans, namely the national TYNDPs, the GRIPs, and the EU-wide TYNDP, as well as between the ENTSG TYNDP and the ENTSG-E TYNDP, both in terms of scope, methodology, and tools, on the one hand, and timing of preparation and release, on the other.
- 1.12. The Agency believes that the scope and methodology of the TYNDP should be upgraded in order to properly address the role and the functions of the underground gas storages (UGS) and liquefied natural gas (LNG) terminals within the overall infrastructure assessment, and not primarily as sources for gas supply of last resort.
- 1.13. The Agency believes that the TYNDP 2013-2022 meets the objectives of Regulation (EC) No 713/2009 and Regulation (EC) No 715/2009 in terms of contributing to non-discrimination, effective competition, and the efficient and secure functioning of the internal natural gas market, by helping identify investment gaps based on certain physical gas system modelling. At the same time, the Agency invites ENTSG to expand the scope of the TYNDP assessments and the tools used for this purpose, in order to allow a better understanding of non-physical barriers and investment gaps at EU-wide and regional level.

## **2. Comments, recommendations and guidance**

### **2.1. Monitoring and evaluation of previous TYNDP 2011-2020 implementation**

The Agency believes that the assessment of the implementation of the previous TYNDP should serve as an important starting point for the preparation of the next network development plan, and that guidance for successful implementation based on experience should be provided in the TYNDP. In the Agency's view, the evidence, the analysis and the evaluation of the implementation of previous TYNDPs are indispensable for preparing more robust future TYNDPs, and are also helpful for devising measures which would help to overcome the identified barriers and investment gaps. The Agency notes that the current TYNDP reports an important decrease of FID projects (more than 50%) in comparison to the previous TYNDP. The Agency acknowledges ENTSG's comment on the decline, as included by ENTSG in the

cover letter accompanying the TYNDP submission, namely the indication that many projects have been implemented, while only few FIDs have been taken during the last two years. The Agency invites ENTSG to consider including in future TYNDPs information about the changes in status of projects as compared to previous TYNDPs, as well as a brief analysis of the reasons for such changes.

The TYNDP also offers no evidence about project advancement over the last two years or changes of expected commissioning dates by the project promoters. The Agency strongly recommends incorporating comparisons to the past TYNDPs in the preparation of the next TYNDP. The Agency believes that full transparency of the evolution of projects should be provided in the TYNDP, inclusive of a listing of all cancelled and delayed investments, along with any reasons (if known) for such change of project status. The Agency's view is that the provision of such transparency is of crucial importance for devising and taking appropriate steps and measures. The Agency is aware that transparency of this nature is not possible without the cooperation of project promoters, and recommends that ENTSG considers ways and means for an appropriate early involvement of project promoters. Additionally, ENTSG and the Agency should discuss and coordinate the monitoring of investment implementation, in line with the relevant monitoring provisions of Regulation (EC) No 713/2009<sup>4</sup>.

## 2.2. Data collection

The Agency appreciates the involvement by ENTSG of all relevant stakeholders in the data submission process and in the identification of the importance of the infrastructure projects included in the TYNDP. In the Agency's view, ENTSG has administered an open and proactive data collection process, to which project promoters of third party projects and from non-EU countries have also been invited, thus providing valuable project-specific data to ENTSG. The newly deployed on-line project data collection process is quite supportive and efficient. Regarding projects that are promoted by European TSOs, the Agency appreciates ENTSG's effort to assess whether the TYNDP is in line with existing national development plans at the time of data collection, and takes note of ENTSG's statement that such an alignment does exist. The Agency recommends including, in the collected data, information about the main challenges ahead of the projects' implementation (including non-physical barriers) and changes in project status, a step which could facilitate the monitoring of the projects' progress.

The Agency recognises that ENTSG is in the process of upgrading its Transparency Platform in pursuit of compliance with the provisions of the amended Transparency Guidelines of Regulation (EC) No 715/2009, and that the upgrading should be completed by 1 October 2013. The Agency notes that the upgrading is also related to the implementation and the monitoring of the Congestion Management Procedures adopted in 2012. The Agency believes that ENTSG should continue requesting the involvement of all TSOs in the Transparency Platform, including a more comprehensive on-line submission of interconnection points' data, as a transparency

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<sup>4</sup> Article 6(7) and (8).

working procedure which would enhance and simplify the assessments of historical and future gas flows, as needed for network planning.

### 2.3. Methodology

#### 2.3.1. Network modelling tool (network and market topology, tool functions and output)

The Agency welcomes the application of a new Network Modelling Tool (NeMo) for assessing the resilience of the European gas network, the supply-source dependence, the network adaptability to supply evolution and the capability for supply source diversification. The network model applied by ENTSOG for modelling network flows is simplified to the extent of “nodes and arcs” consisting of single cross-border interconnections (“arcs”) between the country-based single entry-exit (balancing) zones (“nodes”), except for Germany and France, which are assigned two zones each. However, no non-physical constraints are considered, an assumption which may impede the identification of all investment gaps on the road to market integration and a competitive internal EU gas market. The modelling tool takes into account few restrictions of flows between the nodes, most notably limitations on the maximum and minimum flows (max-min capacity) between the nodes. The Agency believes that using the model with these very few limitations to flows means that the model de facto assumes the existence of an EU-wide integrated “virtual TSO” whose objective is to enable the transportation of an inflow at the EU borders to all off-takes within the balancing zones of the EU. In the Agency’s view, this is an oversimplified “ideal” world, in which only a minimum set of capacity-related bottlenecks exist.

The Agency further notes that the model, which is robust per se, is unable to detect or deal with internal (within a country or zone) bottlenecks and specific interconnection point congestion, neither physical nor contractual, since the dataset which the model uses is aggregated at a higher level. The Agency notes that the top-down assessment carried out by ENTSOG also does not consider contractual limitations that could restrict or modify the range of possible flow patterns. Therefore, the Agency joins ENTSOG’s expectations that regional and national assessments of TYNDP results (flows) must be carried out under a separate process in order to verify the model’s output, or, alternatively, have to be integrated in the TYNDP development process itself. The Agency recommends to ENTSOG to consider, at a minimum, adding more detail to the existing model at the level of interconnection points between entry-exit zones and introducing possible constraints on the flows at interconnection points and within countries, as already experienced historically or as reasonably possible. In any case, projects contained in the TYNDP must produce a coherent European gas transmission network; the TYNDP cannot be the mere sum of the projects proposed at the national level. The Agency invites ENTSOG also to consider other ways of carrying out “reality checks” which would allow the model’s results to be accepted with a high degree of confidence.

The Agency notes that the modelling of gas storages and LNG response to higher demand cases is limited to their role of supplier of last resort. However, in the Agency’s view, there is evidence that some LNG terminals and gas storages are also playing an

important role in the gas markets, especially in some countries and markets, responding to the demand and supply signals on top of their role in mitigating seasonal variations of supply and demand, i.e. they have no dedicated role and in a market environment they are used according to commercial logic, just like any other gas infrastructure. Therefore, the Agency invites ENTSG to consider integrating in the model a more sophisticated behaviour and functions of LNG terminals and storages, rather than limiting their role to that of suppliers of last resort.

The Agency notes that the modelling tool (NeMo) is developed in order to assess daily balancing of gas off-takes and injections on a European scale, and accordingly no within-day profiles are considered in the TYNDP. However, the capability of the network to cope with within-day imbalances may require specific investments. In this modelling approach, storages and LNG terminals, which are known to be adequate flexibility providers, are likely to be undervalued in the TYNDP. For these reasons, the Agency invites ENTSG to consider deploying a better calibrated modelling approach, one which would guarantee a consistent assessment of the role and functions of storages, LNG terminals, and other types of gas infrastructure. The Agency furthermore notes that the complementarity between the national TYNDPs, the GRIPs, and the EU-wide TYNDP is of critical importance, since each of these plans delivers an assessment which is not necessarily part of the assessments carried out for a wider area, but is nevertheless of potential key significance.

#### 2.3.2. Definition of case elements (modelled years, infrastructure clusters, demand situations, supply situations)

The Agency welcomes the modelling of two infrastructure clusters, i.e. taking into consideration the projects with FID already taken, and, as a second step, the modelling of the network system with additional non-FID projects. The Agency underlines the necessity for a coherent project assessment that identifies interdependent projects and provides a clear definition of FID projects.

The Agency notes that ENTSG has already recommended the modelling of an additional cluster related to the proposed Projects of Common Interest for the next TYNDP 2015-2024. The Agency supports ENTSG's integration of the requirements of Regulation (EU) No 347/2013 in the TYNDP modelling process and invites ENTSG to review its work streams related to the TYNDP and the Regulation, and thus help assure a smooth running of the next PCI selection process. The Agency invites ENTSG to consider, in particular, whether the inclusion of all currently proposed PCI projects is needed already in the TYNDP 2013-2022, and reflect on the ways in which the requirement that projects must be included in the TYNDP in order to be eligible for PCI status can be met during the preparation of the next TYNDP and the PCI selection process due for 2015.

The Agency appreciates the harmonisation of the risk level of climatic conditions for the purpose of defining expected demand across Europe, and the inclusion of a demand scenario based on the so-called 14-day "Uniform Risk Situation" (URS). The Agency believes that severe 1-in-20 years EU-wide climatic conditions are unlikely to occur in all modelled countries simultaneously. Therefore the Agency advocates the

synchronous assessment of 1-day and 14-day peak demand of industry, power plants, and residential and commercial customers on a 1-in-20 year EU-wide basis.

### 2.3.3. Assessment of the European gas system

The Agency welcomes the extension of the modelling based on two cases (1-day Design Case Situation and the 14-day URS case) by adding supply stress cases (SSC) related to possible supply and transmission disruption scenarios involving Russia, the Ukraine, Norway, Algeria, Libya, Belarus, and LNG supply minimisation. The Agency also welcomes the upgraded supply source dependence and infrastructure adaptability to supply evolution assessment, and the newly introduced import route diversification assessment and import dependence index.

## 2.4. Demand and supply

### 2.4.1. Demand scenarios (yearly forecasts) and situations (daily peaks)

The forecasted EU gas demand is defined by a bottom-up approach based on TSOs' assessments of future demand. While demand forecasts seem to be, in some cases, conservative, in other cases they are too optimistic and far from reality. The Agency believes that a common approach for TSOs to estimate demand scenarios would be desirable.

The Agency notes that, on the whole, the approach yields a much higher demand scenario in comparison to the Commission Roadmap 2050 and the IEA 450 scenario (assuming a limited increase of temperature to 2°C). At the same time, the bottom-up approach results in demand estimates which are very close to those of the Eurogas Roadmap, which assumes achieving environmental targets with 80% GHG reduction. The Agency shares ENTSG's long term view regarding very demanding EU GHG and climate change targets, particularly when considering the Commission's Roadmap 2050 with significantly reduced natural gas contribution to the overall energy supply. For these reasons, the Agency invites ENTSG to provide basic system modelling cases with reduced gas demand assumptions, allowing the assessment of the system operation and infrastructure requirements under low demand, analysing scenarios with lower need for investments and system capacity under-utilisation.

The Agency believes that the annual demand forecasts are very much related to power generation and may appear overestimated (1% increase per year) in the light of the evidence from 2012 and 2013, when gas demand actually fell due, inter alia, to the substitution of coal for gas in power generation. Therefore, the Agency supports ENTSG's plans to scrutinise, analyse and explain the differences in ENTSG-E and ENTSG gas power demand forecasts, an activity which ENTSG has included in its research and development (R&D) plans for 2013. At the same time, the Agency points out the evidence for a growing decoupling of generation and capacity, partially due to greater wind and solar power generation, a development which underscores the need for the network to be able to deliver under short peak flow conditions, regardless of otherwise low capacity utilisation rates on an annual or longer basis.

The Agency invites ENTSOG and TSOs to provide evidence of demand side measures (DSM), as for instance interruptible transmission contracts, and to assess DSM's potential for abating increased peak daily demand in a cost effective way, integrating it into the forecasted investment needs.

#### 2.4.2. Supply scenarios

The Agency appreciates ENTSOG's assessments of supply trends, including different scenarios, regarding all current major and potential future gas sources, despite the uncertainties inherent in such assessments. Forecasts for a decreasing indigenous gas production and ambiguous prospects for shale gas development in Europe call for the elaboration of strategies for efficient and environmentally friendly gas production research and development in the EU.

The Agency furthermore invites ENTSOG to consider supply scenarios in the context of periods of peak demand and in the light of gas pricing and non-physical system constraints.

On the other hand, according to comments expressed during the last Madrid Forum, the Agency expresses concerns regarding an approach that assesses LNG as one single supply source, and recommends that each supplier country (country producing LNG) is considered as a different supply source.

### 2.5. Assessment results

#### 2.5.1. Infrastructure resilience with identification of investment gaps and remedies

The Agency acknowledges ENTSOG's extensive modelling exercise based on a matrix of more than 200 demand and supply cases, compared to 67 cases in the previous TYNDP. The Agency takes note that ENTSOG has produced results on:

- Assessment of the resilience of the European gas system (identification of investment gaps);
- The dependency of zones on identified supply sources;
- The ability of the European gas system to adapt to different flow patterns; and
- The capability of the European gas system to enable supply diversification.

The Agency welcomes the attention on infrastructure resilience by using the remaining flexibility indicator in order to identify investment gaps related to the impacted countries. The Agency notes with satisfaction that clarity on investment gaps is provided in the context of the assessment of potential remedies (proposed investments) and their contribution to the investment gap mitigation in the reference cases. The Agency also notes the identification of projects contributing to gap mitigation in cases of disruption of supply. At the same time, the Agency invites ENTSOG to provide further clarifications regarding the cases of lacking transmission capacity between the zones when gas is available vs. the cases of lacking supply of gas (disruption cases), so

that a more detailed understanding of the consequences of lacking flexibility and the ways of addressing investment gaps in cases of disruption could be achieved.

Regarding the assessment of transit disruptions via the Ukraine, the Agency considers that such a disruption should be denoted as a Russia-Ukraine gas disruption, a notion which would more equitably address the shared responsibility of these two countries for supply disruptions such as the one experienced in January 2009.

The Agency notes that the results of the modelling based on the reference case of the design-case and the 14-day URS are similar in terms of investment gaps and remedies. Both cases show the lack of infrastructure and/or supply sources around the Baltic Sea (Denmark, Sweden and Finland), in the Balkans (Bosnia and Herzegovina, Serbia and FYROM), and in Luxembourg. For some countries, proposed non-FID projects would mitigate the identified investment gaps.

The Agency notes ENTSOG's statement that the development of LNG terminals in Europe should not increase its dependency on this gas supply source, but rather offers alternative supply sources needed to face high daily demand. On the other hand, ENTSOG also states that LNG is by nature diversified in its potential origins. The Agency tends to see LNG in the light of its positive effects for the diversification of gas sources of different origins and routes, and invites ENTSOG to provide more insights into the consequences of potentially enhanced LNG supply, with the involvement of stakeholders and in the context of ENTSOG's R&D activities.

#### 2.5.2. Supply source dependence under the reference case demand

The Agency appreciates ENTSOG's identification of zones exhibiting strong dependency on Russian gas and LNG, and the finding that dependency on Russian sources of gas will still increase when considering only FID projects.

#### 2.5.3. Adaptability to supply evolution

The Agency appreciates ENTSOG's views regarding the ability of the European gas system to face diverse gas supply mixes and the provision of a valuable overview of potential gas sources and the ranges of their shares in the EU market and within the modelled gas zones.

#### 2.5.4. Import route diversification and import dependency indices

The Agency welcomes the pilot introduction and calculation of indices for import route diversification and import dependence, as well as the assessments of the possible ranges of the indices over the next 10 years. The Agency notes that the assessments focus on the paths that supply can take to enter a zone, and that FID projects slightly improve the import route diversification, while non-FID projects implementation would have a more significant positive impact on the indices. The Agency supports the approach taken by ENTSOG regarding these indices and invites ENTSOG to check normalisation of indices with the aim to increase their visibility.

## 2.6. Barriers to infrastructure investments and potential solutions

The Agency appreciates the assessment of barriers to infrastructure investments and ENTSOG's views regarding potential solutions. At the same time, the Agency notes that the identified barriers only relate to "external" risks, such as regulatory treatment, permit granting, financing issues and political risk. The Agency expects ENTSOG and TSOs to reflect also on their "internal" risks, such as, for example, improper investment decisions due to underestimating risks, improper identification of future supply and demand trends, overlooking important changes in market behaviour of shippers and consumers, etc., and invites ENTSOG to consider providing guidance to its members on how to avoid various types of risk. In this context, the Agency believes that the experience of TSOs is not yet fully tapped and room for the sharing of good practices between them on ENTSOG's platform is not exhausted.

## 2.7. Public consultation process

ENTSOG has carried out a public consultation process from 21 February to 21 May 2013. Six parties provided written comments on the TYNDP 2013-2022 as published by ENTSOG on its website. The Agency recommends to ENTSOG to highlight in future TYNDPs its response to the results of the public consultation, in particular the degree to which ENTSOG finds the comments received during the consultation relevant and the ways in which such comments have been accounted for in the TYNDP's substance and process.

This opinion is addressed to ENTSOG. The opinion is without prejudice to the views and positions which individual NRAs or the Agency may take regarding projects of common interest under Regulation (EU) No 347/2013 or regarding any gas infrastructure project in which NRAs or the Agency may have an involvement.

Done at Ljubljana on 10 September 2013.

For the Agency:

  
Alberto Pototschnig  
Director