

### **Problem identification, scope, definitions, purpose, policy objectives and compliance**

**Question 1:** Do you agree that the problems identified in the problem identification chapter are the main ones? Are there additional problems that should be addressed within the gas balancing pilot framework guideline?

*We agree with the identification of the main problems.*

**Question 2:** Do you agree with the scope (section 1) and objectives (section 3) of this pilot framework guideline? Are there policy issues that should, but are not currently addressed by the draft document?

*Yes, we agree with them.*

**Question 3:** In your view, should the European network code for gas balancing lead to an amendment of national balancing rules? If so, how detailed should the European target model be?

*We don't consider this information as necessary for the Spanish – French - Portuguese cross border trading.*

**Question 4:** Do you agree with the approach of defining a target model for the network code and allowing interim steps subject to NRA approval?

*No comments.*

**Question 5:** What timescale is needed to implement the provisions in the target model outlined in Part II after the network code is adopted? Is 12 months (as in section 10) appropriate or should it be shorter or longer?

*No comments.*

**Question 6:** Should the pilot framework guideline be more specific regarding the purpose and policy objectives for network codes (section 3), in particular areas including nomination procedures?

*No, it's enough specific.*

**Question 7:** With reference to section 3 (proposed policy objectives), do you have comments on how Article 21 of the Gas Regulation 715/2009 should be reflected in the gas balancing network code?

*We have no comments on this respect.*

### **The role of network users and TSOs**

**Question 8:** Is it necessary to have a harmonised approach to the network user and TSO roles regarding gas balancing?

*It's advisable.*

**Question 9:** What are your views on the proposals for the target model to be reducing the need for TSOs to undertake balancing activities?

*We agree with the proposals.*

**Question 10:** Is it appropriate for the target model to impose within-day constraints on network users? If so, should such constraints be imposed on all network users or only on certain groups of network users? If within-day constraints should only be imposed on certain groups of network users, which ones are these? How could this be justified?

*If they exist they would specifically apply for large volatile volumes.*

**Question 11:** Is balancing against a pre-determined off-take profile a useful interim step?

*It appears as a possible solution as far as characteristics of each market are taken into consideration.*

**Question 12:** Should TSOs have the option to sell flexibility provided by the gas transmission pipelines system (linepack) subject to the NRAs' approval? If so, should this be mandatory?

*No, the TSOs wouldn't have this option.*

**Question 13:** Should the target model enable TSOs to provide tolerances to market participants for free or should this be an interim step?

*In Spain, the local TSO (ENAGAS-GTS) provides free tolerance levels, which has helped to the development of a competitive gas market.*

#### **TSO obligations on information provision**

**Question 14:** Are there any additional information requirements that you believe should be included? In particular, should the pilot framework guideline oblige TSOs to provide information beyond the requirements set out in the revised Article 21 and Chapter 3 of Annex 1 to Regulation (EC) No 715/2009 (as recently approved through comitology)? If so, please provide details?

*No.*

**Question 15:** What are the benefits and disadvantages of TSOs providing network users with system information?

*We think that more transparency in the system information implies more advantages for all the stakeholders.*

**Question 16:** What are the costs of TSOs providing network users with system information? How do these compare against the benefits and/ or disadvantages?

*Without this information we can't develop a liquid gas market across Europe.*

#### **Balancing periods**

**Question 17:** What are your views on our assessment of the policy options?

*In our opinion, the daily system is the best one.*

**Question 18:** Are there relevant additional policy options on balancing periods which have not been considered in this section? Should these be considered going forward?

*No, all of the existing ones are included in the section.*

**Question 19:** Is it necessary to harmonise balancing periods? If so, what are the benefits of a regional or pan-European harmonised balancing period? If not, why is it not necessary? Please explain your answer.

*We don't see the real necessity of this harmonisation, since the existing OBAs between the TSOs allows the trading between different balancing areas.*

**Question 20:** If you agree with a harmonised balancing period, what do you consider is the appropriate length of the balancing period?

*No comments.*

**Question 21:** Do you agree with the target model? (Please explain your answer).

*As we have already said before, for us the best balancing period is the daily one. So, we agree with the length of the target model's period.*

*On the other hand, we consider within day physical restrictions as necessary.*

**Question 22:** What would be the costs of implementing the target model in (and beyond) your Member State or balancing zones(s) (as the case may be)?

*The cost should be as lower as possible.*

#### **TSO buying and selling of flexible gas and balancing services**

**Question 23:** Do you agree with our assessment of the policy options?

*Yes, we agree.*

**Question 24:** Do you agree with the target model? (Please give reasons). If so, what do you consider are the benefits and disadvantages of the target model?

*Yes, we agree with the target model, since we consider that it obliges the TSO to manage the system more efficiently.*

**Question 25:** What are the costs of implementing the target model in your Member State?

*We have no comments.*

**Question 26:** What interim steps, if any, may be needed in your Member State or balancing zone(s)?

*To implement the target model in our Member State it should be necessary:*

- *To create the conditions to have a liquid wholesale gas market.*
- *To create a balancing platform.*

**Question 27:** Is it appropriate for balancing platforms to be part of the target model subject to NRA approval, even where markets are sufficiently liquid to enable TSO procurement on wholesale markets?

*No, it's not appropriate.*

**Question 28:** Is it appropriate for TSOs to procure balancing services on the wholesale market and/or or is appropriate for these to be procured on the balancing platform? Should TSOs be permitted to reserve long-term contracts for flexible gas and/ or associated capacity for this purpose?

*We think that the TSOs should buy and sell their balancing gas on the wholesale market at market conditions.*

**Question 29:** In your view is it possible in your market to reduce TSOs' reliance on long-term products? If so, how may this be the best achieved?

*Yes, it could be achieved due to the high flexibility, procured by the regasification plants.*

### **Imbalance Charges**

**Question 30:** Do you agree with our assessment of the policy options?

*Yes, we agree.*

**Question 31:** Do you agree that methods for calculating imbalance charges should be harmonised? If so please explain what the benefits may be. If not, please explain why not.

*It's advisable: the benefits of harmonised imbalance charges are that they should ease the trade between different countries.*

**Question 32:** What are your views of the target model? In particular, please provide your views on:

- Whether an imbalance charge should be applied when TSOs do not take balancing actions;

*The objective must be a market mechanism to fix the imbalance costs. In the interim period it may have an interim mechanism.*

- What the imbalance charge should be based on, if it is applied when the TSO has not taken a balancing action, whether imbalance charges should be dual or single priced;

*The imbalance price should be based on the wholesale market price.*

- Whether imbalance charges should be based on the marginal price.

*Yes.*

**Question 33:** What would be the costs and benefits of implementing your preferred options in your Member State?

*No comments.*

**Question 34:** What are your views on the interim steps in the document?

*The duration of the interim step should be limited.*

### **Cross-border cooperation**

**Question 35:** Are there any other relevant policy options on cross-border cooperation that should have been included in this section?

*No.*

**Question 36:** Do you agree with our assessment of the policy options in this section?

*Yes, we agree.*

**Question 37:** Are Operational Balancing Accounts (OBAs) useful to deal with steering differences? Should the network code make it mandatory on TSOs to put in place OBAs?

*Yes.*

*No, the OBAs shouldn't be mandatory.*