



# Consultation 46 report



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## 1 Introduction

From the 26<sup>th</sup> of October 2020 until the 13<sup>th</sup> of November 2020 included, Fluxys Belgium consulted the market on its proposed changes in the regulatory documents.

The proposed modifications in the regulatory documents aim at:

- (i) The integration of Zelzate 2 into VIP BENE
- (ii) The alignment of the definitions with regards to the injection of new gases (i.e. biomethane) in the natural gas transmission grid
- (iii) The clarification of the definition of collateral taking into account short term bookings
- (iv) Technical changes

## 2 Consultation process

Fluxys Belgium launched this market consultation by publishing the proposed documents on its website - at the usual location for such consultations, supported by an announcement on the homepage - and via direct e-mailing to all registered market participants and associations. During the period from October 26<sup>th</sup> until November 13<sup>th</sup> (included), stakeholders were invited to submit their written feedback and, if needed seek additional information through bilateral contacts with Fluxys Belgium.

Taking into account the different comments received, Fluxys Belgium submits for approval to the CREG, the so amended version of the STA, TP and ACT.

## 3 Outcome of consultation process

All comments received are listed and individually treated in the "Q&A's", included in the consultation report submitted to CREG – see appendices.

Feedback was received from 2 individual Network Users and 1 representing organization, FEBELIEC.

The feedback from the Network Users is confidential. The representing organization is supporting the integration of Zelzate 2 into the VIP BENE but raises some questions concerning market integration and price convergence and is mentioning that a quantified analysis should have been done. Given the service offer of Fluxys Belgium does not change significantly and Fluxys Belgium is not a party of the market integration initiative on the Dutch side, Fluxys Belgium did not conduct such analysis.

The organization is also indicating the strict timing and short time before implementation of the consultation. Fluxys Belgium recognises this but wants to mention that there was a general communication and individual meetings done beforehand.

Concerning the Injection of new gases, the representing organization is raising a concern about gas composition and quality and the influence it might have on industrial processes. Fluxys Belgium confirms it will continue to strive delivering all over the Natural Gas network a stable and predictable gas quality that is within the applicable contractual and legal specifications.

## 4 Appendices

### 4.1 *Appendix I: Market consultation – public material*



shaping together  
a bright energy  
future

## 1. Market consultation - public material

- a. E-mail: invitation to submit comments
- b. List of documents in consultation
- c. Questions & Answers
- d. Printed copy of written comments

E-mail: invitation to submit comments



## Fluxys Belgium : Market Consultation 46

### Changes in the regulatory documents

Dear customer,

As from 26 October 2020, participate in our market consultation on the transmission regulatory documents with a focus on:

- The integration of Zelzate 2 into VIP BENE
- The alignment of the definitions with regards to the injection of new gases (i.e. biomethane) in the natural gas transmission grid
- The clarification of the definition of collateral taking into account short term bookings
- Some technical changes

You will find all the details on [our website](#).

You are kindly invited to send your written comments to [marketing@fluxys.com](mailto:marketing@fluxys.com) by **Friday November 13<sup>th</sup> 2020**. Please specify in your response, whether the content is to be treated as confidential or not. Unless otherwise mentioned, all comments will be treated as non-confidential.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Guillaume".

A handwritten signature in blue ink, appearing to read "Hanaol".

List of documents in consultation



The documents are available on our website: <https://www.fluxys.com/en/productservices/empowering-you/customer-interactions/consultations-in-belgium/fluxys-belgium-marketconsultation-46>

# Market Consultation 46 - Changes in the regulatory documents

COMPANY

Fluxys Belgium

ACTIVITY

Transmission

26/10/2020

As from 26 October 2020, participate in our market consultation on the transmission regulatory documents with a focus on:

- The integration of Zelzate 2 into VIP BENE
- The alignment of the definitions with regards to the injection of new gasses (i.e. biomethane) in the natural gas transmission grid
- The clarification of the definition of collateral taking into account short term bookings
- Some technical changes

The following document summarizes the proposed changes: [One page note](#)

## Documents in consultation (with track changes):

[Standard Transmission Agreement](#)

[Transmission Program](#)

[Access Code for Transmission Attachment A](#)

[Access Code for Transmission Attachment B](#)

[Access Code for Transmission Attachment C1](#)

[Access Code for Transmission Attachment C2](#)

[Access Code for Transmission Attachment C4](#)

[Access Code for Transmission Attachment D](#)

## Questions & Answers

Questions and Answers

#	From	Confidential?	Topic	Questions / Comments by Stakeholders	Answers / Comments by Fluxys Belgium
1.1	Febeliec	No	Integration Zelzate 2 into VIP BENE	Febeliec regrets, however, the absence of a quantified analysis (CBA) of the impact of the proposals on market integration and price convergence. Furthermore, Febeliec requests Fluxys to perform an impact assessment on existing long or medium term contracts for capacity reservation on the Zelzate 2 interconnector and to make sure no market parties are negatively impacted by the proposed VIP integration.	The market integration and price convergence is at the Dutch side and Fluxys Belgium was no party to the market integration initiative. As from January 1 2021, the old Zebra network will be integrated in the GTS network and Fluxys Belgium is following the European Commission Regulation (EU) 2017/459 of 16 March 2017 establishing a network code on capacity allocation mechanisms in gas transmission systems (NC CAM). Article 19.9 of this Regulation explicitly provides that when two or more interconnection points connect the same two adjacent entry / exit systems, the relevant adjacent transmission system operators shall offer the capacities available at the interconnection points at one virtual interconnection point. At the Belgium side, there is no impact on the booked capacities. Future capacity bookings will be done on the VIP BENE that contains the former Zelzate 2 interconnection point.
1.2	Febeliec	No	Injection of new gases	As for the proposed changes in definition of natural gas and the changes proposed to allow the injection of new gases (i.e. biomethane) in the natural gas transmission grid, Febeliec refers to its answer to Market Consultation 47, and more specifically to the potential impact of the gas composition and quality on industrial processes, as well as on the importance of the predictability and speed of change of gas quality and composition for the integrity of industrial processes using natural gas. Febeliec strongly advises Fluxys *to continue to strive for a stable and predictable gas quality and composition in the whole of its grid, acknowledging that current gas quality is well within the legal specs; *to thoroughly consult grid users potentially impacted by the injection of “new gases” every time a new producer requests injection into the Fluxys grid.	With regards to the changes proposed for the injection of new gases in the Natural Gas network, Fluxys Belgium recognises Febeliec concerns about the predictability and speed of change of gas quality composition. Under the assumption that the response to market consultation 47, which was not yet received when this report was created, concerns potential impact of the gas composition and quality on industrial processes, Fluxys Belgium will continue to deliver gas within specifications and strive towards stable and predictable gas quality all over the Natural Gas network. In accordance with the rules set forth in the European Network Code for Interoperability and Data Exchanges, Fluxys Belgium shall continue to provide suitable gas quality information to relevant end users, in full transparency.

Printed copy of written comments

All reactions			
Company	First Name	Last Name	Confidential
FEBELIEC	Peter	Claes	No




Fri 13/11/2020 22:14

FEBELIEC <febeliec@febeliec.be>

Fluxys Market Consultation 46 - Changes in the regulatory documents – Febeliec reaction

To  marketing@fluxys.com

 You replied to this message on 16/11/2020 12:57.

#### Fluxys Market Consultation 46 - Changes in the regulatory documents – Febeliec reaction

- Febeliec thanks Fluxys for the opportunity to react to this consultation and the proposed changes in the regulatory documents.
- Febeliec regrets the timing of this consultation :
  - The consultation ends only 1,5 months before the entry into force of the proposed integration of Zelzate 2 into the VIP BENE, which leaves very little time for Fluxys to respond to the consultation reactions, and even less time for market parties to adapt to the new interconnector situation as of 1/1/2021.
  - The consultation allows only 3 weeks response time (including a holiday week), which leaves very little time for stakeholders to work out an in-depth, consensual reaction to the multiple topics tackled in the consultation documents.
- A priori, Febeliec supports the integration of the Zelzate 2 interconnection into the VIP BENE, as it simplifies the reservation process of cross-border capacity for market parties and contributes to market liquidity and integration. Febeliec regrets, however, the absence of a quantified analysis (CBA) of the impact of the proposals on market integration and price convergence. Furthermore, Febeliec requests Fluxys to perform an impact assessment on existing long or medium term contracts for capacity reservation on the Zelzate 2 interconnector and to make sure no market parties are negatively impacted by the proposed VIP integration.
- As for the proposed changes in definition of natural gas and the changes proposed to allow the injection of new gasses (i.e. biomethane) in the natural gas transmission grid, Febeliec refers to its answer to Market Consultation 47, and more specifically to the potential impact of the gas composition and quality on industrial processes, as well as on the importance of the predictability and speed of change of gas quality and composition for the integrity of industrial processes using natural gas. Febeliec strongly advises Fluxys
  - to continue to strive for a stable and predictable gas quality and composition in the whole of its grid, acknowledging that current gas quality is well within the legal specs;
  - to thoroughly consult grid users potentially impacted by the injection of “new gasses” every time a new producer requests injection into the Fluxys grid.

Kind regards,

**Peter Claes\***

**on behalf of Febeliec vzw/asbl**

*Federation of Belgian Industrial Energy Consumers*

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\* acting as Manager of Econergy VOF, General Manager of Febeliec

***Febeliec represents the industrial consumers of electricity and natural gas in Belgium.***

