



- Department 6 -

Ref: 8615-NDP Gas 2015 Consultation Gas NDP

14 April 2015

Gas Network Development Plan drafted by the transmission system operators

– Consultation on the draft Gas National Development Plan presented by the transmission system operators (as of 1 April 2015)

The transmission system operators (TSOs) submitted the draft of a joint national Gas Network Development Plan (NDP) to the Bundesnetzagentur on 1 April 2015 in accordance with section 15a of the Energy Act (EnWG). The Bundesnetzagentur is now seeking views on the draft NDP from all current and potential network users, as provided for by section 15a(3) EnWG.

Comments and views on the draft Gas NDP 2015, which is available on the Bundesnetzagentur's website, should be structured as set out below; respondents are free to comment on some or all of the following points or any other issues:

1. General and fundamental issues

Significance of the NDP, comprehensibility, transparency, procedures, etc.

2. Scenario framework (draft Gas NDP 2015, section 2)

2.1. Gas demand assumptions

- 2.1.1. Do you think that in future three gas demand scenarios or one single gas demand scenario (e.g. average gas demand) should be drawn up?
- 2.1.2. Which studies should be taken as a basis for the scenario(s) to determine future gas demand?

2.2. Outlook for the next scenario framework and NDP –

Potential development of network modelling requirements

- 2.1.3. How do you rate the criteria proposed by the TSOs for temperature-dependent firm and freely allocable capacity ("TAK") and dynamically allocable capacity for power plants ("DZK") in respect of capacity on pipelines interconnecting with storage facilities and power plants (section 2.6.1)?
- 2.1.4. How do you rate the alternative criteria proposed by the Bundesnetzagentur (see Annex, in German only)?
- 2.1.5. Which modelling variant(s) for the distribution system operators' (DSOs') capacity demand should be included in the NDP 2016 with respect to capacity/network development? Why? Do you think changes would be necessary?
 - 2.1.5.1. How do you rate the report on the factors influencing the DSOs' capacity demand (at interconnection points)?¹ Can the approach be adopted for long-term capacity planning?
 - 2.1.5.2. Do you have any specific proposals as to how the plausibility of the DSOs' long-term forecast can be improved?
- 2.1.6. Do you consider the TSOs' assumptions on future H gas sources appropriate? With regard to future scenario frameworks and NDPs: which alternative scenario for high calorific gas (H gas) sources should be used? Please give details.

3. Transmission network modelling (section 3)

3.1. Assessment of the input parameters for network modelling in the draft NDP (section 3.2):

- 3.1.1. Gas power plants
- 3.1.2. Other exit points to industrial facilities
- 3.1.3. Gas storage facilities
- 3.1.4. Cross-border/market area interconnection points
- 3.1.5. Downstream distribution networks

¹ In German only: Studie über Einflussfaktoren auf den zukünftigen Leistungsbedarf der Verteilnetzbetreiber, Forschungsgesellschaft für Energiewirtschaft mbH, 11/2014 [http://www.fnb-gas.de/files/ffe -
studie ueber einflussfaktoren auf den zukuenftigen leistungsbedarf der verteilnetzbetreiber.pdf](http://www.fnb-gas.de/files/ffe_-_studie_ueber_einflussfaktoren_auf_den_zukuenftigen_leistungsbedarf_der_verteilnetzbetreiber.pdf)

4. Current transmission network and status quo of grid expansion (section 4)

- 4.1. How do you rate the definition of the "start network"? Are the criteria used to distinguish the "start network" (including measures to be implemented in the short term) from other expansion measures transparent? If not, please give reasons and specific suggestions for alternatives.
- 4.2. Is the current analysis of interruptions in gas transport (section 4.7) comprehensible and adequate? Which conclusions are to be drawn from the results of the analysis? Do the results provide, for instance, an adequate basis for an additional modelling variant aimed at avoiding potentially recurring historical interruptions?

5. Development of low calorific gas (L gas) supply – Security of supply scenario (section 5)

- 5.1. Are the assumptions made about the L gas capacity balance reasonable and transparent and do they take proper account of both supply security and the requirements of the L gas market?
- 5.2. Are the criteria chosen for identifying areas for conversion (from L to H gas) transparent and clear? Are there additional criteria that should be included in the decision?
- 5.3. Is account taken of all fundamental aspects of market area conversion that affect measures in the transmission network (e.g. capacity at interconnection points with downstream networks and final consumers, network topology, possibility of dividing downstream networks)?
- 5.4. Are the measures at TSO level and the resulting areas for conversion suitable to meet the long-term L gas capacity requirements? Please give reasons.

6. Development of H gas supply (section 6)

6.1. H gas capacity balance

- 6.1.1. Is the H gas capacity balance comprehensible? How do you rate the assumptions made about the balance? Please give alternative suggestions, if applicable.
- 6.1.2. How do you rate the methodology used to attribute the additional demand resulting from the capacity balance at market area and interconnection points? Is the methodology transparent and comprehensible?

6.2. Additional capacity demand based on the distribution of H gas sources

- 6.2.1. How do you rate the methodology used to attribute the additional gas feed-in volumes resulting from the forecast distribution of H gas sources to the market area and interconnection points? Is the methodology transparent

and comprehensible? Is proper account taken of adjacent infrastructure in neighbouring countries?

- 6.2.2. Please give alternative suggestions for allocating additional capacity demand at interconnection points together with underlying facts and figures.
- 6.2.3. Do any specific changes need to be made in respect of the distribution of sources for specific entry points or regional clusters? Please give reasons.
- 6.2.4. Would you as a shipper make long-term bookings for capacity resulting from the H gas balance and allocated to specific cross-border interconnection points to ensure the economic viability of planned expansion measures? Please answer this question in particular with regard to additional capacities at cross-border points Wallbach (Germany-Switzerland), Bunde/Oude (Germany-Netherlands) and Überackern (Germany-Austria).
- 6.2.5. Is – given insufficient bookings for the new capacity and thus inefficient investments – the risk of an increase in charges at other interconnection points acceptable for the market?

6.3. Consideration of other countries' NDPs and ENTSOG's TYNDP

Do the cross-border interconnection points take sufficient account of all the necessary factors such as demand in other countries/adjacent market areas, findings from the Community-wide network development plan (ENTSOG TYNDP), projects of common interest in Annex I of the trans-European energy infrastructure Regulation (Regulation (EU) No 347/2013) and future developments (e.g. changes in gas flows to be expected)? Are there contradictory approaches compared to other NDPs? Are there any important influencing factors from other countries that affect grid expansion in Germany and that have been omitted?

7. Modelling results and grid expansion proposal (sections 7 and 8)

- 7.2. General comments on the modelling results: Is the description of the grid expansion measures sufficiently transparent and clear? Is all the information sufficient for you as a shipper?
- 7.3. How do you rate the grid expansion proposal in terms of its content? Are all the projects included that are necessary to ensure adequate grid expansion to meet the long-term capacity demand?
- 7.4. Are necessary expansion measures missing?
- 7.5. Are certain measures unnecessary? Please give the identification number(s) when commenting on individual expansion measures.

8. Power-to-gas (NDP section 9)

9. Tables and annexes

Please comment on the transparency and clarity of the individual annexes. Please give, for instance, specific suggestions for changes to improve the transparency of the annexes. Please also comment on the specific input data and indicate any errors requiring correction.

10. Other comments

Market players are hereby invited to comment on the draft NDP 2015 (of 1 April 2015) and on the points and questions raised above. Comments may be made jointly and should be submitted in electronic format (e.g. data stick/disc or email) **by Friday, 5 June 2015** to:

Bundesnetzagentur

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53105 Bonn

Email: NetzentwicklungsplanGas@bnetza.de

We intend to publish the responses on the Bundesnetzagentur's website, in the original, and so would ask respondents to give their consent to publication when they submit their comments. If your response contains **confidential information**, please send us an additional version with this information **blacked out**.

In addition to the written consultation process, the Bundesnetzagentur intends to hold a **public workshop** to provide all current and potential network users with the opportunity to comment in person on the draft Gas NDP 2015. This workshop will take place at the Bundesnetzagentur's office (Tulpenfeld 4, 53113 Bonn) on

► **Tuesday, 19 May 2015.**

If you would like to **register** for the workshop, please send an email with your name, company and contact details to NetzentwicklungsplanGas@bnetza.de **by Friday, 8 May 2015.**