



# **Consultation 67 report - Access Code Transmission and Transmission Program**



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## 1 Introduction

From March 21st 2024 until April 22th 2024 included via the consultation 67, Fluxys Belgium consulted the market on its proposed changes in the regulatory documents, following the end of the L-gas to H-gas conversion in Belgium

The following changes relate to the Transmission Program and the Access Code for Transmission (ACT) – Attachments A, B, C1 and F:

- (i) Removal of the flexibility provided in the L-gas market zone
- (ii) Removal of the trading services on the L-gas market zone and associated spot products on EEX.
- (iii) Removal of L Capacity Switch Service for Exit Transmission Services
- (iv) Nomination rules on L-gas market zone
- (v) Minor clarification on the offer of Dunkirk LNG Terminal entry capacity

## 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 March 21st 2024 until April 22th 2024 included, stakeholders were invited to submit their written feedback and if needed, seek additional information through bilateral contacts with Fluxys Belgium. An online info session was given on March 29th 2024 and recording of the session was made available on the website on the same day.

Taking into account the comment received, Fluxys Belgium submits for approval to the CREG, the so amended version of the Access Code for Transmission that aims to become applicable as from publication.

## 3 Outcome of consultation process

Feedback was received from several Networks Users, one End-User and one representing organization. Some of them indicated their feedback as being confidential.

### Public feedback

There was a shared demand that the CREG/ILR decisions should be published as soon as possible, in order to support market operators to conclude the necessary actions for the transition to the new market scenario and be duly prepared to the yearly auction.

One Network User asked whether September 2024 month could also be eligible for the service L-gas entry capacity switch service. Fluxys Belgium will propose to the CREG via the documents submitted for approval, the possibility to switch entry capacities on Hilvarenbeek-L also for September 2024. Network Users will have to book new Monthly capacity to be switched for Month September via the Monthly Auction of August 19th 2024.

One Network User indicated that there is a risk of mismatched capacity on the Dutch side of the border because on the Dutch side of the border, this service is available only via the diversion to a different point at the same location.

One Network User indicated the linepack of the pipeline allowing transit to France and the associated flexibility should be fully put at disposal of the French TSO in order to guarantee the French Security of Supply and at term attenuate as much as possible the physical constraints met by this Network User on the L—Zone. In response to that, Fluxys Belgium wants to remind the Quality Conversion to H service is a kind of flexibility service. Extra capacity can also be booked and used to provide more flexibility. Moreover, if requested by market participants, Fluxys Belgium could analyse the introduction of an additional service for flexibility. Finally, TSO agreements are not the subject of this consultation. The French TSO can always contact Fluxys Belgium in case of specific request.

#### Confidential Feedback

One Network User indicated they will reach out to the Dutch TSO and Regulator to ask them to give Network Users more service flexibility to align capacity between interconnection points.

## 4 Appendices

- 4.1 **Appendix I: Market consultation – public material**
- 4.2 **Appendix II: Market consultation – confidential material**



## Appendix I 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 67: Update for L-gas market zone and connection agreement operational annexes

Dear Customer,

Participate in our market consultation that will take place from **21 March 2024 to 22 April 2024**. The following changes are introduced in the regulatory documents:

1. Introducing the required changes accompanying the new configuration of the L-gas market zone after the end of the L-gas to H-gas conversion
2. Introducing a new obligation on the TSO to inform in advance the relevant end users in case a local producer connects to the grid
3. Clarification of applicable quality specifications and responsibilities following previous consultation 66



An online info session will be given on **Friday March 29th** as from **10h30** : [Join the meeting now](#) (Meeting ID: 326 036 845 042 ; Passcode: EVAH6i).

The documents can be consulted on our [website](#).

You are kindly invited to send your written comments to [marketing@fluxys.com](mailto:marketing@fluxys.com) by **22 April 2024 before 17:00 CET**.

List of documents in consultation



The documents are available on our website: [Market Consultations in Belgium - Transmission \(fluxys.com\)](https://fluxys.com)

# Fluxys Belgium market consultation 67: Update for L-gas market zone and connection agreement operational annexes

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Participate in our market consultation that will take place from **21 March 2024 to 22 April 2024**. The following changes are introduced in the regulatory documents:

1. Introducing the required changes accompanying the new configuration of the L-gas market zone after the end of the L-gas to H-gas conversion
2. Introducing a new obligation on the TSO to inform in advance the relevant end users in case a local producer connects to the grid
3. Clarification of applicable quality specifications and responsibilities following previous consultation 66

The following document summarizes the proposed changes: [Summary Note Consultation 67](#)

An online info session was given on **Friday March 29th** as from **10h30**.

[Info Session - slides](#)

## Documents in consultation (with track changes):

- [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 F](#)
- [Connection Agreement – End Users](#) (FR)
- [Connection Agreement – End Users](#) (NL)
- Connection Agreement – End Users - [Annex 1](#) (FR)
- Connection Agreement – End Users - [Annex 1](#) (NL)
- Connection Agreement – End Users - [Annex 4](#) (FR)
- Connection Agreement – End Users - [Annex 4](#) (NL)
- Connection Agreement – End Users - [Annex 7](#) (FR)
- Connection Agreement – End Users - [Annex 7](#) (NL)
- Connection Agreement – Local producer of compatible gases - [Annex 7](#)

You are kindly invited to send your written comments to [marketing@fluxys.com](mailto:marketing@fluxys.com) by **22 April 2024** before **17:00 CET**.

Please mention in your response whether the content is to be treated as confidential or not. Unless otherwise specified, all comments will be treated as non-confidential.

## Questions & Answers

Questions and Answers					
#	From	Confidential ?	Topic	Questions / Comments by Stakeholders	Answers / Comments by Fluxys Belgium
1.1	ENGIE	NO	Flexibility Offered	Engie contests Fluxys' proposal to not offer flexibility anymore for Network Users on L-grid : the linepack of the pipeline allowing transit to France and the associated flexibility should be fully put at disposal of the French TSO to guarantee the French Security of Supply and at term attenuate as much as possible the physical constraints met by ENGIE on the L—Zone.	* "Quality Conversion to H Service" is a flexibility service offered to the Network User to also help coping with physical constraints. * If requested by market participants, Fluxys Belgium could analyse the introduction of an additional flexibility service. * TSO agreements are not the subject of this consultation. The French TSO can always contact Fluxys Belgium in case of specific request.
2.1	ENI	NO	Decision CREG	Eni invites Fluxys Belgium to kindly ask CREG to provide a response to the market preferably by the end of May, in order to support market operators to conclude the necessary actions for the transition to the new market scenario and be duly prepared to the yearly auction.	Noted, Fluxys Belgium will inform CREG.
2.2	ENI	NO	Misalignment end conversion L2H and startdate L Capacity Switch Entry	Considering the end of the conversion from L-gas to H-gas as of 1st of September 2024, we would like to point out that there is an inconsistency between the start date of the phase-out and the start date of the L Capacity Switch Service (1st of October 2024). Therefore, we would like to ask Fluxys Belgium to introduce the transfer of L-gas entry capacity from interconnection point Hilvarenbeek L to any H-gas entry interconnection point adding the month of September 2024 to the period already foreseen (i.e. from October 2024 onwards).	Fluxys Belgium will propose to the CREG via the documents submitted for approval, the possibility to switch Entry capacities on Hilvarenbeek-L also for September 2024.
2.3	ENI	NO	Risk of mismatch capacity on the Dutch Side	Furthermore, we take the opportunity of the present consultation to inform Fluxys Belgium of the risk of mismatched capacity on the Dutch side starting from the 1st of September 2024 in relation to the end of L gas market in Belgium. We clearly understand and appreciate the service offered by Fluxys Belgium of switching capacity from a L gas entry point to any other H gas entry point in the system, in line with the physical conversion of L/H gas downstream. Precisely in this regard we want to highlight that, as a result of the fact that on the Dutch side of the border this service is available only via the diversion to a different point at the same location, shippers switching capacity in Belgium will end up with mismatched capacity on the Dutch side.	Hilvarenbeek-L capacity can be switched to VIP BENE on Belgium side.
3.1	FEPEG	NO	Decision CREG	FEPEG invites Fluxys Belgium to kindly ask CREG to provide a response to the market preferably by the end of May, in order to support market operators to conclude the necessary actions for the transition to the new market scenario and be duly prepared to the yearly auction scheduled for 1st of July 2024, not only from a Belgian perspective, but also on the Dutch side.	Noted, we will inform CREG.

Printed copy of written comments

All reactions			
Company	First Name	Last Name	Confidential
FEPEG	Luc	Huysmans	No
ENI	Viviana	Palmeri	No
ENGIE	Nasma	Sahbani	No

# FEBEG

**marketing@fluxys.com**

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**From:** Luc Huysmans (Febeg) <luc.huysmans@febeg.be>  
**Sent:** 22 April 2024 16:34  
**To:** marketing@fluxys.com  
**Subject:** FEBEG reaction to Market Consultation 67: Update for L-gas market zone and connection agreement operational annexes  
**Attachments:** 240422 FEBEG Cons Fluxys 67 L gas.docx

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear all

Please find in attachment the FEBEG reaction to Market Consultation 67: Update for L-gas market zone and connection agreement operational annexes.

Best regards

Luc Huysmans  
power generation & energy policy advisor



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## Introduction

FEBEG thanks Fluxys for the opportunity to react to Market Consultation 67: Update for L-gas market zone and connection agreement operational annexes.

The consultation focuses on the required changes accompanying the new configuration of the L-gas market zone after the end of the L-gas to H-gas conversion; a new obligation on the TSO to inform in advance the relevant end users in case a local producer connects to the grid; and a clarification of applicable quality specifications and responsibilities following the previous consultation 66.

The deadline for this consultation is 22 April 2024, EOB.

The remarks and suggestions of FEBEG are not confidential.

## Remarks

1. FEBEG invites Fluxys Belgium to kindly ask CREG to provide a response to the market preferably by the end of May, in order to support market operators to conclude the necessary actions for the transition to the new market scenario and be duly prepared to the yearly auction scheduled for 1st of July 2024, not only from a Belgian perspective, but also on the Dutch side.
2. Following the previous consultation 66, Fluxys proposes clarification of applicable quality specifications in the Connection Agreement – Local Producer compatible gas – annex 7.

However we fail to understand how to articulate the values in this annex 7 with the previously consulted ACT Attachment C.4 – 12. Operating Conditions and quality requirements at Domestic Points for Injection (distinction whether or not the gas can reach an Interconnection Point or Loenhout; min/max of Wobbe index).

FEBEG would welcome further clarification on this point.

# ENI

**marketing@fluxys.com**

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**From:** Palmieri Viviana <Viviana.Palmieri2@eni.com>  
**Sent:** 22 April 2024 16:15  
**To:** marketing@fluxys.com  
**Cc:** Terenzi Andrea; Colombo Chiara; DL Logistics Gas Portfolio Northern Europe  
**Subject:** Eni response | NON-CONFIDENTIAL | Fluxys Belgium - Market Consultation 67  
**Attachments:** 20240422 Fluxys BE Consultation 67\_Response Eni-NON-Confidential.pdf

Non si ricevono spesso messaggi di posta elettronica da viviana.palmieri2@eni.com. [Informazioni sul perché è importante](#)

**[EXTERNAL EMAIL]** DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Dear Sir, dear Madam,

Please find enclosed Eni S.p.A.'s reponse to Fluxys Belgium market consultation 67.  
Our response is to be treated as non-confidential.

We would like to kindly ask you the acknowledge receipt of letter.

Best regards,  
Viviana Palmieri

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**Eni S.p.A. response**  
**to Fluxys Belgium' Market Consultation 67 of 21<sup>st</sup> of March 2024,**  
**Update for L-gas market zone and connection agreement operational annexes**

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Eni welcomes the opportunity to provide inputs to Fluxys Belgium' "Market Consultation 67 of 21<sup>st</sup> of March 2024, update for L-gas market zone and connection agreement operational annexes".

In this regard, Eni invites Fluxys Belgium to kindly ask CREG to provide a response to the market preferably by the end of May, in order to support market operators to conclude the necessary actions for the transition to the new market scenario and be duly prepared to the yearly auction scheduled for 1<sup>st</sup> of July 2024, not only from a Belgian perspective but also on the Dutch side.

Considering the end of the conversion from L-gas to H-gas as of 1<sup>st</sup> of September 2024, we would like to point out that there is an inconsistency between the start date of the phase-out and the start date of the L Capacity Switch Service (1<sup>st</sup> of October 2024). Therefore, we would like to ask Fluxys Belgium to introduce the transfer of L-gas entry capacity from interconnection point Hilvarenbeek L to any H-gas entry interconnection point adding the month of September 2024 to the period already foreseen (i.e. from October 2024 onwards).

Furthermore, we take the opportunity of the present consultation to inform Fluxys Belgium of the risk of mismatched capacity on the Dutch side starting from the 1<sup>st</sup> of September 2024 in relation to the end of L gas market in Belgium. We clearly understand and appreciate the service offered by Fluxys Belgium of switching capacity from a L gas entry point to any other H gas entry point in the system, in line with the physical conversion of L/H gas downstream. Precisely in this regard we want to highlight that, as a result of the fact that on the Dutch side of the border this service is available only via the diversion to a different point at the same location, shippers switching capacity in Belgium will end up with mismatched capacity on the Dutch side.

To conclude, we kindly invite Fluxys Belgium to consider our above-mentioned points.

# ENGIE

[marketing@fluxys.com](mailto:marketing@fluxys.com)

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**From:** nasma.sahbani@engie.com  
**Sent:** 22 April 2024 17:06  
**To:** marketing@fluxys.com; Balansys Marketing  
**Cc:** bernard.chassin@engie.com; beatrice.debacker@engie.com;  
thibaut.husselstein@engie.com  
**Subject:** ENGIE's comments to Fluxys' consultation N°67 and to Balansys consultation n°11

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Bonjour,

Merci de trouver ci-dessous les commentaires d'ENGIE à la consultation n°67 de Fluxys et la consultation n°11 de Balansys :

La canalisation d'Hilvarenbeek à Taisnières B, d'une longueur d'environ 200 km et d'un diamètre de plus d'1 mètre, possède une grande capacité de stockage et représente une source importante de flexibilité. Par exemple, le stock en conduite a permis d'assurer la consommation de la Belgique pendant certaines périodes, comme du 26 décembre 2023 de 1:00 à 04:00 et du 09 au 10 février 2024 de 23h00 à 2h00, où les flux de gaz étaient nuls aux points d'interconnexion réseau Taisnières B et Hilvarenbeek (source ENSTOG).

Cependant, avec la fin définitive de la consommation de gaz L en Belgique, cette infrastructure sera exclusivement dédiée à l'approvisionnement en gaz L de la France et deviendra en quelque sorte une extension du réseau GRTgaz. Son exploitation sera entièrement axée sur la sécurité d'approvisionnement en gaz L pour la France.

Il est important de noter que tous les gestionnaires d'infrastructures sont confrontés aux défis liés à l'adaptation des installations techniques face à la baisse des consommations de gaz L. ENGIE conteste donc la décision de Balansys et Fluxys de ne plus offrir de service de flexibilité aux expéditeurs sur le réseau en gaz L en Belgique, à moins que le stock en conduite et la flexibilité correspondante ne soient entièrement mis à la disposition du gestionnaire de réseau de transport français GRTgaz pour garantir la sécurité d'approvisionnement de la France et à terme gommer autant que possible les contraintes physiques rencontrées par l'expéditeur ENGIE sur la zone L.

Cordialement,

**Nasma Sahbani**  
Gas Capacity Contract Manager  
Global Energy Management & Sales

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