

**Public consultation comments**  
**Plano de Desenvolvimento e**  
**Investimento da RNTIAT**  
**2016-2025**  
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**Enagás-GTS**

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Enagás GTS welcomes ERSE's Public Consultation regarding the Portuguese National Development Plan for Gas 2016-2025 proposed by REN Gasodutos and believes that this kind of initiatives helps in enhancing common understanding and the historical collaboration between Iberian countries, as a paramount issue for better planning future needs and synergies. Enagás GTS wants to highlight the importance of Portugal investments within the development of the Iberian gas market, providing a higher interconnection capacity level between Spain and Portugal.

The scope of the following comments is to contribute and complete the information with regards to the Spanish Gas System, as well as to clear up certain aspects related to the Spanish gas network development.

The 3<sup>rd</sup> interconnection project between Spain and Portugal has recently been labelled by the European Commission as a Project of Common Interest (PCI). Several benefits resultant of this project have been described by REN Gasodutos throughout the document, but certain clarifications should be set up from the Spanish development point of view.

1. Despite the fact that the 3<sup>rd</sup> Interconnection has been considered a PCI and has been included in ENTSOG's TYNDP, from the Spanish point of view, a Mandatory Planning should be launched supporting the project and its related core network investments.
2. Enagás GTS and REN Gasodutos have historically worked together from the technical point of view with the scope of identifying the synergies needed to optimize the technical management of both systems, guarantee the security of supply, efficiently solve operation issues and propel the single gas market creation. Concretely, and for the issue hereby related, Enagas GTS and REN Gasodutos have recently set up a technical working group with the aim of developing, under a single hydraulic simulation, a common study of the 3<sup>rd</sup> Interconnection ES-PT, trying to identify investments and capacity figures from a common perspective. The results of the study should help to clarify several aspects concerning the development of this project and will complement the information described in the Portuguese National Development Plan proposal.

3. With regards to the “*Anexo III Análise Das Alternativas À 3ª Interligação PT-ES*”, Enagas GTS would like to underline that the latest preliminary studies carried out for the 3<sup>rd</sup> Interconnection project indicate that the reinforcement of Zamora Compressor Station should be included in the first phase of the project, since it is needed even for small flows of gas, and not in the third phase as stated in the document on page 229.

## 2.2 Traçado por Vale de Frades

### Infraestruturas

A 3ª Interligação PT-ES por Vale de Frades encontra-se dividida em três fases distintas de construção. A 1ª fase ligará Celorico da Beira a Zamora através de um gasoduto com 162 km de diâmetro DN700 em Portugal e 80/85 km de diâmetro DN700 em Espanha. Numa 2ª fase seria necessário uma nova estação de compressão no Lote 6, e na 3ª fase encontra-se prevista a duplicação do troço de gasoduto entre Cantanhede e Mangualde (Lote 6), numa extensão de 68 km, **assim como o reforço da EC de Zamora em Espanha.**

No quadro seguinte apresentam-se os pontos fortes e os pontos fracos associados ao traçado por Vale de Frades, assim como o desempenho desta solução face aos principais indicadores apresentados no PDIRGN.

4. In the same Annex, REN Gasodutos has carried out an analysis with its best information and tools available (among others, certain historical studies developed together with Enagás) trying to identify the Spanish reinforcements that theoretically would be needed for the different alternatives proposed in the document. Concerning this issue, Enagás GTS must point out that, even knowing that these reinforcements are linked to discarded alternatives, it is not possible to carry out a meaningful analysis without a detailed study from the Spanish point of view that should be proposed under the shelter of a National Planning. The referred reinforcements mentioned throughout the proposal are the following:
- a. *Duplicação do gasoduto existente entre o terminal de GNL de Mugardos, Estação de fronteira de Tuy em Espanha, ampliação do terminal de GNL de Mugardos da Reganosa em Espanha and Uma estação de compressão entre o terminal na Galiza e a fronteira.*
  - b. *Construção de um gasoduto paralelo ao já existente entre Córdoba e Almendralejo, and uma estação de compressão entre Córdoba e Almendralejo*

*c. um novo gasoduto com 155 Km de comprimento e DN700 de diâmetro, ligando a estação de Fuentes de Oñoro /Vilar Formoso à EC de Zamora*

5. With regards to the "*Anexo IV Potencial Benefício Decorrente Da Diferença De Preços De Importação De GNL*", Enagás GTS would like to highlight that on 16<sup>th</sup> December the products trading started in MIBGAS platform and, since then, there is a transparent price that progressively should be used as a Spanish Gas Hub price reference. This reference would be quite useful, among others, to calculate a more accurate spread price between both markets with the scope of estimating the potential use of the 3<sup>rd</sup> Interconnection, as stated by REN in the referred annex. Nevertheless, with the Iberian Gas Market set up and the future 3<sup>rd</sup> Interconnection development, the price spread could disappear and potentially, together with certain regulatory adjustments, turn into a single price reference.