

Von: von Ohlen, Nils
Gesendet: Freitag, 11. September 2020 13:48
An: von Ohlen, Nils
Betreff: WG: Kunsultationsrückläufer

Von: robert parker <rtparkert2p@gmail.com>
Gesendet: Donnerstag, 20. August 2020 05:59
An: Walkus, Michael <michael.walkus@gascade.de>
Betreff: Consultation_Document_Mallnow_en.pdf some reactions

Dear Michael and Gascade,
since my initial email bounced, this elaboration is going just to you, to give you maximum flexibility in your discussions with Gaz-System, ONTRAS, and others.

Your huge maximum build on Page 8 probably maximizes the Gascade profit, but there is no way it maximizes the benefits to the market and the people who pay the tolls, since your proposal is in flagrant violation of your own criteria in Section 10 on page 19. Building the wasteful NEL looping must either: a) lead to a continuing substantial fall in the use of non-depreciated EUGAL and partially depreciated OPAL, or b) not be used at a high load factor itself.

There is no new receipt gas at Lubmin or Greifswald or Mallnow. The receipt capacity being added already exists, as does the upstream capacity that supplies it. Recognizing capacity that exists is a poor justification to add facilities that must starve existing facilities to be used.

Sure, build the NEL mid-way compression if you like, 50 MW, 75 MW, whatever. But all that looping is not a NEED, it is a WANT. It is one approach to add East-to-West capacity, but a demonstrably inferior one. There are three main choices, and some combinations: a) NEL, b) NETRA @ Steinitz, and c) STEGAL at Reckrod.

Since no new receipt capacity is needed built at Lubmin, we can recognize sufficient capacity already exists to Keinbaum. So another choice is looping and compression along NETRA, which would have bi-directional benefits, too. The shortest addition is more STEGAL looping so all gas that reaches Rückersdorf can flow west to Reckrod. This would be increased, later by a loop from Brandov or one starting north of Sayda where OPAL and EUGAL still share right-of-way.

The combinations to consider would involve the Radeland compression increases and then diverting JAGAL gas from Halle to Steinitz and then west to Rehden or Achin.

But there is still a problem on an annual average basis by adding Radeland capacity to get more gas to HSK. it is double-counting to again push that same gas west to Reckrod or west to Steinitz. The only way to fill both capacities, incrementally is to pull gas from storage, which means injections must occur at other times of the year. This makes the NEL looping doubly (or triply?) wasteful.

So first solve the NEED and then see what other capacity should be added, too. STEGAL loop, check. Reckrod MIDAL extension to MEGAL, check as well. Radeland CS adds, yes. TTF cs adds, yes.

But NEL looping, no. MIDAL looping north of Reckrod, minimize it. Between Hamburg-Achim-Rehden two new lines are not needed. Drop at least one.

And then the maybes, NEL mid-point compression, sure, go ahead. Finish the looping to Ellund, why not, so long as Denmark reciprocates.

With the projected declines in Norway production, and Denmark/Poland building expensive bypass capacity to avoid a Dornum-Mallow trip through Germany. Severe care must be taken to not build wasteful ipe, or pipe that strands other investments.

The NEL looping as shown is highly wasteful, ineffective, inefficient, and can be trivially improved upon. Please do so. If Gascade would prefer a STEGAL looping over a Steinitz focus, fine. Someone has fought hard to position Germany's gas network as the key focus. Don't raise your costs so high that advantage is lost.

If you are curious why I have these opinions, ask. If you wonder why I share them, I prefer that pipelines make rational investments that make long-term sense, and that new facilities are used, or value adding, for a significant load factor over much of their useful life.

I predict the NEL looping, as shown, could never receive approval in Canada. And the MIDAL loop would die as well. Just opinions. Since Entry-Exit tolling is not widespread in Canada, its inefficiencies as evidenced by the proposed NEL looping would prompt some interesting discussions.

If you can downsize your maximal case, or make it more rational, that would help.

And speaking of rational capacity adds, Mallnow eastbound measurement adds rank infinitely higher than the NEL and MIDAL looping. Include them.

Robert

----- Forwarded message -----

Cc:

Bcc:

Date: Tue, 18 Aug 2020 19:58:01 -0700

Subject: TGPS<>Gascade MDAR 2019-10-21 et. al.

Dear Gascade and Gaz-system,

I enjoyed reading the documents you circulated. I will point out one other pair of investment opportunities for the TSOs that belong on the public "nobody requested this, but it is still potentially needed" list. Then I will comment on the other westbound issues and entry-exit items.

1) Eastbound Mallnow flow.

THE/GasCade/JAGAL double or treble the eastbound meter capacity.

Gaz-System/TGPS modify station piping as needed to allow increased eastbound flows to Wloclawek or even Zambrow and GIPL.

why belongs on the list:

Poland has announced it has insufficient security of supply if one seller can cut off all their gas supply. So this risk goes back before any Mallnow eastbound measurement was installed.

Poland has said ns1 and ns2 reduce supply security for the EU by concentration in a corridor.

Poland has proposed concentrating their 10 bcm Baltic pipe and 5 bcm (soon 7.5 bcm) LNG regas terminal into a narrow NW Polish corridor.

So, adding the Baltic pipe will not solve the supply security problem unless the corridor issue is solved, too.

Poland can use storage in Ukraine to assist with peak winter requirements, but Poland will need some firm delivery capability to Ukraine, which has not yet been installed.

The SK<>PL interconnector will help, once it is installed and operational, although gas from SK will likely cost much, much more than peaking gas from Gascade/THE at Mallnow.

Since Poland chose to run naked without this protection, it makes sense to size the protection for 2022+ with SK>PL possible and no purchases received from or via UKR and BELARUS.

Gascade should put the project on the list, have a cost estimate, and continue to report it as both "no non-binding request received, but multiple public statements show it could be needed" AND "no binding firm request from the market, yet" until Poland and Gaz-system get around to arranging their supply security. A separate issue for Gascade is the necessary facilities to make the additional Exit capacity firm. With all the other GPL+NCG=THE issues, this one might get deferred for cost estimation, since firm Mallnow exit capacity means cutting firm Mallnow entry to Zero/Nil flow.

2) Eastbound Waidhaus Firm Exit Flow

It's about time. Long overdue. Allow isolation of the three lines Primda-Rozvadov-Waidhaus to allow the dn1200 to maintain westward flow while allowing eastbound discharge down one or both of the other lines. Reliable gas supply to the CEE demands it. If the TSOs prefer to just flow the net, that's fine. Reverse either the Ruhr Gas or the MEGAL compression, likely do not have to do both. Likely one is already reversed, but no one will admit to it and sell firm exit capacity. Do it.

3) Westbound Mallnow Flow

It seems perfectly plausible the Polish dn1400 could deliver more gas to Mallnow cs than the JAGAL dn1200 can move to Kienbaum and beyond. It is logical to not increase the total technical entry capacity, to eliminate the need to build more intra-German capacity downstream of Kienbaum.

Since no capacity increase is planned, it is curious why the market must wait so long to reallocate capacity between the capacity types. This should be faster. Why not right away?

4) It is well-known that Entry-Exit tolling can force TSOs to over-invest in their facilities above the bare minimum needed to meet customer requirements at the lowest cost. BNetzA has decided the trade-offs are worthwhile, so THE must build.

The wicked overbuild as proposed to support full Entry-Exit is unconscionable. It makes THE squander pipeline capital on the same order of magnitude as Romania and Poland. Cut that sh*t out.

Yes it looks pretty on paper to overbuild the Lubmin receipt capability, not just by adding NEL compression, but with over 50% NEL looping, too. Overkill. Keep the midpoint cs. drop the eastern loop.

If you cut carefully, there are just three congestion points between GPL and NCG, 1) the NEL, 2) NETRA, and 3) STEGAL. Or if you count Gazela, that's 4. Of course, first split gaspool into GP NE and GP West. And combine GP West with NCG first.

Since OPAL and EUGAL already exist, and OPAL south end is under-contracted, the cheapest de-congestion project is a full Stegal loop OPAL>Reckrod. Second cheapest is a JAGAL loop (south end from Radeland) and a STEGAL line #4

west. Third cheapest is Kienbaum-Steinitz-Rehden. NEL loop is least cheap, most expensive since it squanders so much pipeline capital. Heck it's cheaper to partially loop NETRA and JAGAL-STEGAL than to loop along NEL.

With the East-West congestion resolved, NCG/GP West needs sufficient northbound capacity from Reckrod and/or Rehden. Resolving the NE>West congestion farther south saves money, overall. Why lay 2 new lines from Hamburg>Rehden while there are still some unlooped portions north to Ellund?

Keep the western border compression, and just the NEEDED compression at Achim and Rehden. The Midal loop south of Reckrod will still be needed, that STEGAL gas has to go someplace. Get it to MEGAL.

Lastly, since ONTRAS has flexibility with the 3 main systems east of Steinitz, increase the flow flexibility there. So gas from Achim can go south, while more gas from Kienbaum can go to Achim. Add a north for lower cost builds, and a lower total-cost-of-ownership for the future THE backbone.

Robert

ern receipt from NEL or OPAL or EUGAL. And Loop west of Steinitz might pay out.

Please do not overbuild as seriously as Poland and Romania have done, are currently doing, and still plan to do. Please stop.,

Cheering for lower cost builds, and a lower total-cost-of-ownership for the future THE backbone.

Robert