



Joint statement on the NC Interoperability & Data Exchange



- ▶ DSOs support the specific objectives of NC IO & DE :
 - A single European Market for natural gas on wholesale level
 - Market integration by reducing barriers at the interconnection points (IPs)

- ▶ DSOs are concerned :
 - NC scoping and impact go far beyond the IPs
 - Instead of setting the rules for 41 TSOs, the NC unnecessarily burdens downstream companies (2500+ DSOs) by additional rules and costs



- ▶ Two issues identified during development of NC Interoperability

1. Odourisation :

Leave ultimate decision making and cost recovery mechanisms to concerned national/regional authorities

- Allow sufficient time frames if responsibility is moved from TSO to DSO
- Strive for regional integration as a step towards full market integration

2. Monitoring of gas quality :

Avoid excessive monitoring obligations downstream

- First phase : more gas quality monitoring at IPs only
- Detailed monitoring in the national grid shall depend on the necessity of the market (decision by NRA) or may be provided as optional services



- ▶ Problem identified during development of NC Data Exchange :
‘Common European data exchange solution’
- Scope of Art. 22 is unclear and should be clarified :
Application would have a major impact on 2500+ DSOs (including metering operation) and 2500+ suppliers, creating unreasonable costs
- Formulation of scope should correspond to the necessary objectives of the NC and should be restrictive :
 - Exclude TSO-DSO relationship explicitly, or
 - Limit scope to TSOs and network users at IPs (replace “counterparties” by “network users”)
- Avoid high costs to implement European rules for purely national processes that do not hinder EU market integration