



## **Interoperability NC**

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## GIE remarks on draft NC (I)

### **ENTSOG has achieved a lot**

- GIE supports the overarching targets of this Network Code
- ENTSOG once again runs a fair and transparent process and has so far achieved reasonable and pragmatic solutions
- The crucial aspect of the NC are the impacts on market participants which may exceed those of the TSOs by far:
  - Gas Quality/Odourisation solutions may have impacts on downstream systems or end consumers
  - The potential investments of “counterparties” in IT may substantially exceed the investments of TSOs
  - Temporarily keeping the current national-data exchange solutions in parallel to the common data exchange is a pragmatic approach



## GIE remarks on draft NC (II)

The processes described by ENTSOG are sufficient in terms of stakeholder involvement and public consultations.

The Network Code should describe more in detail:

- how the Member States will be early involved in the decision-making process
- how to proceed on Member States level when it comes to a potentially different time schedule

The FG has widened the scope, as a consequence the vital interests of “counterparties” need attention on member states level too



**Thank you for your attention.**

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