

## **Eurogas Response to DG ENER's Consultation on the establishment of the annual priority lists for the development of network codes and guidelines for 2016 and beyond**

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Eurogas has considered the Consultation about work on codes and guidelines for 2016 and beyond.

The associated explanations confirm that there has been good progress on the rules on gas. Eurogas therefore agrees with the broad approach set out in 1.2.

- Work to complete the tariffs code should continue. This should proceed on the basis of a compromise that takes full account of the concerns expressed by stakeholders during the process.
- The procedure to adopt the needed revisions to the CAM Code to include incremental capacity provisions should be completed.

Eurogas also agrees on the sense of integrating the forthcoming CEN standard into the network Code on interoperability, making the necessary provision binding.

Looking beyond 2016, Eurogas would call for the implementation of the current Codes to be ensured and assessed, before new Codes are envisaged. Problems are occurring which, if they cannot be addressed within a Code, then may require an amended Code. Eurogas is here thinking in particular of the CAM Code, which has given rise to a problem of inconsistencies in the capacity products and services, provided by adjacent TSOs. Eurogas maintains its view that a pan-EU Code on Trading is not required, but TSOs should be required to harmonise the terms and conditions of their capacity products on both sides of an IP.

Also, further work affecting tariffs may be needed to address problems such as stranded assets, and consequently the not-yet agreed tariffs code may have to be amended post 2016.

Eurogas supports the emphasis in 2016 of pursuing work on the electricity network rules, to address the continuing problems in the electricity market.