



**SOCIETATEA NAȚIONALĂ DE TRANSPORT
GAZE NATURALE "TRANSGAZ" SA MEDIAȘ**

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POINT OF VIEW OF TRANSGAZ – ROMANIA

Regarding the document for drawing up the annual priority list identifying the areas to be included in the development of the network codes
(CE document under public investigation)

- 1) It is obvious that within 2012 it is compulsory to continue the endeavours to develop the network codes concerning the CAM, balancing, harmonized transmission tariff structures and interoperability.
Regarding the new priorities for 2012, we think that the intent to develop new regulations for connecting to a network and for third party access has greater priority than the development of regulations for network security and reliability.
When drawing up this proposal we also had in mind the fact that in our opinion the two above mentioned areas are under the same subject matter of the Directive and on the Regulation and that is granting the non-discriminatory and transparent third party access to the transmission network. At the same time we are sure that each TSO applies the most suitable procedures for ensuring the security and reliability of his network.
It should also consider assigning a lower priority level to the issues related to the rules for trading.
- 2) Starting with 2013 the efforts should be focused upon:
 - Emergency operational procedures;
 - Rules for trading;
 - Network security and reliability;
 - Energy efficiency of the gas network;
 - Transparency rules.
- 3) Even though on the political and legal level the issues related to natural gas and electricity are treated mutually, it is obvious that there are some elements specific for each field, starting from the type of energy transmitted and ending with the related infrastructure. That is why the similarities between the two fields are not as great as they may seem at first sight.
For this reason, in our opinion dealing with the problems according to the recommendation of ENTSOE and ENTSO-E is a reliable solution.

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