

**EUROGAS RESPONSE TO ERGEG'S PUBLIC CONSULTATION
ON GAS TRANSPARENCY MONITORING**

General

Do you consider the existing transparency requirements to be sufficient?

It is a matter of concern to Eurogas that the Monitoring Report issued by ERGEG in October showed deficiencies in the implementation of the transparency requirements in Regulation 1775/2005. A priority must be the full implementation of the existing legislation. This is a major responsibility of TSOs, but Eurogas also agrees that the issue of the role of NRAs in this respect as in other aspects of enforcement also needs to be addressed.

Eurogas has also identified a number of areas requiring improved transparency (see below) where more detailed information will help ensure that all TSOs are providing system users with the information they need. We note an amendment process is already underway on Regulation 1775/2005 and that meanwhile more timely progress may also be reached on a voluntary basis, with users' influence on the GIE's platforms supported by the Madrid Forum, and in the GRI. Eventually the Guidelines could also be modified, in line with best practice.

Are the existing transparency requirements too prescriptive?

No. Common EU requirements need to be sufficiently detailed to ensure that shippers are provided with the right information in a user-friendly format. Transparency requirements need to be sufficient, in order to contribute to the goal of market harmonisation.

If not, what are areas where more transparency is needed?

See below

Users

From a users' perspective, is the information provided by TSOs in line with your own observations, especially with regard to usability, completeness, updating, and coverage of information/data provided.

For companies to comment

What are areas where further improvement by the TSOs is needed to ensure better usability of the information provided?

Although many TSOs have made significant improvements in the provision of information in the last year or so, more could be done to ensure that transparency is fit for purpose. The information provided by TSOs should not only allow users to make better informed decisions on system use, but should help TSOs in co-operation to make available and sell more capacity.

- As a priority Eurogas would like to see more flow information (physical, contractual, nominated) on a daily basis (shown by balancing period if this is shorter). We would also like to see more granular information, for example monthly data with regard to a year's contract.
- All non-user specific information should be published openly. TSOs should not use special programmes or databases, requiring user sign-up.

- The TSOs should also provide information on
 - probability of interruption (3.1j of the Guidelines is not specific)
 - information that would be useful to balancing
- Detailed system maps showing the names of all entry and exit points that are to be classed as relevant points.

As mentioned, however, progress on these points may be possible without recourse to legislation. Eurogas has raised them with GIE in connection with their work on the Transparency Platform.

Also in view of the concerns expressed on the 3- shipper rule, Eurogas has proposed that Guidelines be developed to contribute to a better and more harmonized implementation of this rule.

From your own experience, which are the transmission systems with congestion where historical capacity information is not available and/or the probability of an interruption is not transparent?

Eurogas members will refer to specific problems in their individual responses.

Taking transparency forward, what is it that you as users would like to see (e.g. single secondary market platform, specific pieces of information etc.)?

Eurogas supports the objective of the GIE Platforms on Transparency and Interoperability. Users' views on their needs have to be taken into account in their construction. So far, dialogue with GIE in this respect has been positive.

Eurogas, however, notes that the success of a common platform is ultimately dependent on the data made available by individual TSOs. The obligations in the Regulation have to be met, and improvements achieved through the GRI.

In any case, harmonized approaches are essential for example on the definitions of products, and units. In this respect CBPs of EASEE-gas have yielded only limited improvements. GTE+ must turn its attention to this issue.