

GIE response to CEER's public consultation on CEER 2014 Work Programme

1. Introduction

GIE welcomes CEER's consultation of its 2014 Work Programme. GIE is glad to contribute to this public consultation with its views.

2. Who is GIE?

Gas Infrastructure Europe (GIE) is an association representing the sole interest of the infrastructure industry in the natural gas business such as Transmission System Operators, Storage System Operators and LNG Terminal Operators. GIE has currently 69 members in 25 European countries.

One of the objectives of GIE is to voice the views of its members vis-à-vis the European Commission, the regulators and other stakeholders. Its mission is to actively contribute to the construction of a single, sustainable and competitive gas market in Europe underpinned by a stable and predictable regulatory framework as well as by a sound investment climate.

3. GIE general comment

In order to guarantee a level of transparency which is user-friendly, GIE invites CEER to publish an explicit overview of its results, comparing the approved work program against the outcome delivered. This could be presented in an explicitly and user-friendly way, maybe as part of the annual report. It could be something similar to what ACER has done in its Annual activity report 2011 (page 58, overview of results of the regulatory activities in 2011)

4. GIE specific comments

GIE would like to comment only on those items of the draft work program which affects more directly the GIE members' activities.

- ***On the overall strategy focus: do you consider that the deliverables we have proposed in their entirety appropriately address and cover the key objectives?***

Regarding focus 2: New legislative/policy developments

Answer:

- GIE would like to emphasize the need for a coordinated effort between ACER and CEER concerning streamlining data reporting obligations upon energy market actors, so as to rationalize the resulting costs and ensure an adequate level of obligations for infrastructure operators.
- ***Monitoring Report on the implementation of Guidelines of good practice for storage system operators (GGPSSO) for capacity allocation mechanisms (CAM) and congestion management principles (CMP)***

"In 2011, CEER published GGPSSO for CAM and CMP. As a next step, Gas Storage Europe (GSE) prepared an implementation plan and SSOs started implementation. This report will review developments."

Answer:

- How important is this deliverable: very important/important/not important
- Further comments: The implementation plan was developed with wide stakeholder involvement. Stakeholders had the opportunity to discuss with GSE members their understanding how to interpret the provisions of the GGSSO and how they should be implemented. GSE members have implemented the rules for CAM and CMP as included in the 3rd Energy Package and are committed to implementing further rules as specified in the GGSSO including 2011 amendments. However, GIE would like to point out that the importance of this task has lessened significantly as regards to CMP given the evolution of the market with storage capacity in the EU.

- **Monitoring Report on the implementation of the GSE Transparency Template**

“In 2013, GSE developed – in close cooperation with CEER – a Transparency Template. The 23rd Madrid Forum invited CEER to monitor the implementation of the Template. The report will also analyse how gas storage is integrated in entry-exit systems, what type of gas capacity products are offered and whether there are obligations to contract storage capacity in order to become a shipper in individual countries.”

Answer:

- How important is this deliverable: very important/important/not important
- Further comments: GIE considers this point as very important. GSE members are committed to transparency. With the Storage Map and AGSI platform already in place, the new Transparency Template is an additional effort to enhance transparency for all interested stakeholders.

The structure as well as the content of the Transparency Template was intensively discussed with stakeholders and CEER. Each GSE member has committed to implementing the transparency template during 2013. But full transparency is only achievable if all storage operators deliver the high level of transparency as GSE members do. Therefore non-members are invited to implement the template too. GSE is prepared to support them in this exercise. GSE would be pleased if CEER and the respective NRAs could support this effort in order to have all European SSOs on board. GSE welcomes the monitoring and is ready to support CEER when monitoring the implementation.

Regarding the connection to Entry-Exit systems and obligations to book capacity, GSE would like to better understand the aim of the respective analysis before commenting on it.

- **Status Review on monitoring access to EU Liquefied Natural Gas (LNG) terminals**

“CEER will report on capacity availability, capacity use, services offered and congestion management at EU LNG terminals in 2012 and 2013. The report will also analyse how LNG terminals are integrated in the individual entry-exit systems. The results will be compared to data collected in 2012 and any major changes will be highlighted”

Answer:

- How important is this deliverable: very important/important/not important
- Further comments: GIE welcomes an update of the ‘Status Review on monitoring access to EU Liquefied Natural Gas (LNG) terminals’. As the LNG market may evolve rapidly, it is important that the information and data shall reflect the most recent developments.



Therefore, GLE strongly suggests CEER publish its report within the shortest possible time after the examined period; otherwise the work done may lose part of its interest.