

# GTE Transparency Workshop

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## Eurogas views on Transparency

### Overview

**A. Basic Conditions for Transparency**

**B. Eurogas reflection on the GTE Implementation Proposal**

## A. Basic Conditions for Transparency

- **User-friendly transparency of system operations is a prerequisite of a well functioning gas market**
  
- **There should be a presumption towards such transparency, unless a need for confidentiality can be justified to the NRA, in line with the requirements of the Regulation 1775**
  
- **Deficiencies in the implementation are still a matter of concern**
  - *We have seen good progress in the meantime, but TSOs as service providers for shippers have a responsibility to deliver improvements*
  
  - *NRAs have to enforce better implementation, as far as necessary*

## A. Basic Conditions for Transparency

- **Eurogas views on areas for further improvement**
  - *Need for more flow information on a daily basis and also more granular information, for example monthly data with regard to a year`s contract*
  - *Publication of all non-user specific information. TSOs should not use special programs or databases*
  - *TSOs should provide information on*
    - *probability of interruption*
    - *information that would be useful to balancing*
  - *Detailed system maps should show the names of all entry and exit points that are to be classed as relevant points*
  
- **Minimum Transparency Requirements List (MinTra)**
  - *Outlines common views of different associations on minimum requirements*

## B. Eurogas reflection on the GTE Implementation Proposal

- Eurogas welcomes the ongoing work to improve the GTE + transparency platform
- Eurogas welcomes that GTE generally recommends to its members to carry out the implementation of the MinTra list
- GTE` s proposal for implementation requires further discussion
  - *Different national regulatory framework may not serve as an excuse to implement necessary measures which contribute to the internal market*
  - *Cost argument should be considered, but system users wish to be reassured that this argument should not be exaggerated*
  - *System Users will accept justifiable costs which are included in the tariffs*

## B. Eurogas reflection on the GTE Implementation Proposal

- Questions/remarks regarding GTE Implementation Proposal (list)
  - General requirements:
    - *Difference between information access to everyone and “every interested party”?*
    - *How to solve problems of units (Mwh /kWh)?*
    - *No secure website for web-based booking and nomination?*
  - Gas quality information:
    - *Daily actual measured values: why only specified to M + 1?*
    - *How many TSO do not apply GCV (see in GTE list under comments) and where is the exact obstacle to harmonise this in all the other cases?*
  - Transmission capacity:
    - *Meaning of “Following the adoption of Plan by TSO” (see under update)?*

## B. Eurogas reflection on the GTE Implementation Proposal

- Questions/remarks regarding GTE Implementation Proposal (list)
  - Gas Flow:
    - Why distinguishing for daily allocation between  $D + 1$ ,  $M + 1$ , and  $M + 12$  ?
    - Same question regarding daily flows and interruptions ( $D + 1$ ,  $M + 1$ )
  
  - Balancing and related:
    - GTE proposal would not comply with the minimum requirements
    - Why linepack information could commercially harm the TSO or lead to abuse of the balancing regime by the network users at all (see comments), when all network users would have access to the information anyway?
    - What are alternative operational/commercial data (see under information/services)?
  
  - Seasonal Outlook Report:
    - How the outlook will be specified?