

GTE Position on the Third Package

TSOs are committed to build an efficient single European market in gas and support the establishment of ENTSOG and Agency through the Third Package.

A key point still to be resolved in the debate is the relationship between the Commission, ACER and ENTSOG. For the framework to deliver in an efficient manner, TSOs see the relationships as follows:

- ENTSOG will facilitate the development of technical rules and relevant network rules by leading the drafting process.
- ENTSOG will not seek to expand its role beyond its responsibilities and competencies. How shippers, producers and traders trade is a matter for them and ENTSOG would only be involved where commercial rules relate to the networks.
- ENTSOG will operate within a defined policy framework utilising robust, transparent and responsive consultation processes to develop proposals that consider and fairly balance the interests of all stakeholders.
- Agency will monitor ENTSOG in the performance of its activities. TSOs will thus NOT self-regulate themselves through ENTSOG, they will not be “policemen” of the system.
- Through NRAs, Agency will monitor implementation of the codes.
- Agency will have a central role in ensuring NRAs act in line with Agency’s opinions and recommendations.
- Both Agency and ENTSOG will make periodic reports via open hearings to the Parliament.
- Commission will use its right of legislative initiative if Agency or ENTSOG do not deliver.

Justification

Roles and Responsibilities must be clear so that inconsistencies currently in place that prevent the energy market to develop into a single European market must be remedied.

TSOs Have a Unique Position on the Market while not Being a Market Player

- TSOs ensure **secure, reliable and efficient operation** of the transmission networks which are the backbone of the gas system
- TSOs provide a suitable market place for interested stakeholders by bridging the gap between physical and contractual aspects of gas transmission (**‘commodity-making principle’**)

Binding membership of TSOs in ENTSOG along with the given tasks ensure that TSOs will deliver.