



APPENDIX

**First GTE+ Consultation Document  
Stakeholder Feedback Proforma**

Please use the attached template for Stakeholder feedback to the first GTE+ Consultation Document. Please send completed template, and/or any other feedback to [gte@gte.eu.com](mailto:gte@gte.eu.com) by 31<sup>st</sup> July

Organisation:	Centrica
Name:	Helen Stack

**Q1: Does the programme identify the correct priorities for GTE+ focus during 2008/2009?**

Answer	Further comments
No	Whilst we generally agree with the topics picked as priority areas i.e. transparency, capacity coordination, the Winter Outlook and the Ten Year Network Development Plan, we would also like to see balancing addressed at an early stage.

**Q2: Are there any other priorities that should displace the priorities identified?**

Answer
Yes

If yes;

What other priorities should be addressed?	<p>We would like to see balancing addressed within the workplan, as current the lack of harmonization between the balancing regimes in different TSO systems remains a significant barrier to cross-border trade. For example, GTE could identify quick-wins that could be achieved in the short-term to streamline balancing regimes between interconnected networks and discuss a timetable for longer-term objectives, such as full market-based balancing and merging balancing zones across two or more networks. For such longer-term objectives, TSOs could usefully share the best-practice experiences from those networks that have already achieved these. One quick-win could be for members to demonstrate compliance with the ERGEG GGP for Gas Balancing.</p> <p>With respect to transparency, ensuring publication of the data users need and not just the creation of a software platform need to be addressed. Whilst we recognize that it is not within GTE's power to require its members to comply with EU legislation and regulatory guidelines, as the single EU industry association representing TSOs, GTE has a clear role to play in actively encouraging its members to publish the information users need.</p>
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Which elements of the plan should be displaced?	If any elements of the work plan do not facilitate the creation of a better functioning integrated gas grid or more effective non-discriminatory access for system users, then they should be reassessed. In particular, GTE must take the fullest account of input from stakeholders as the programme develops, and ensure that they changing priorities are reflected in the work programme
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**Q3: Are the objectives and deliverables associated with each plan realistic?**

Organisational Development	<p>We welcome the fact that GTE is looking at the formation of ENTSOG at an early stage. This will facilitate the timely implementation of the finalized Third Package.</p> <p>We note that there will be further stakeholder consultation on the formation of ENTSOG by both ERGEG and GTE. As noted in this consultation document the work programme will need to evolve in the light of these processes.</p> <p>It is vital that the final ENTSOG has a transparent and robust process for consulting with stakeholders. It is essential that the rules governing the consultation process can be amended at a later date in the light of experience. For this reason it may be appropriate for the consultation process to be established separate from the ENTSOG statutes, so that changes could be initiated by ERGEG or stakeholders.</p>
Transparency Platform	<p>We prioritize availability of the raw information from TSOs websites and removal of the “-3 shipper rule” over the creation of a software platform. However, we believe that the finalized platform would be a useful tool.</p> <p>The presentation and online location of information on transparency differs considerably between TSOs. Completion of the objectives of Phase 1 (i.e. posting of weblinks to the individual information items) will be very useful.</p> <p>The success of the deliverability of the full transparency platform will depend largely on the accuracy and availability of information published on TSOs’ individual websites. As mentioned above, GTE has a role in actively encouraging its members to provide accurate and timely information.</p> <p>Centrica believes it is essential to the success of the project that the current “-3 shipper rule” is removed. However, pending the outcome of the Third Package all European TSOs should as a minimum seek to comply with the NW GRI 2007 regulatory guidelines on implementation of the “-3 shipper rule”.</p> <p>Pending the outcome of the Third Package, it would be useful for the Transparency Platform to be used to show the current status of regulatory approval requests for non-publication.</p>

Winter Outlook	<p>The Winter Outlook will be of high interest to stakeholders. We would encourage GTE to circulate this Winter Outlook widely. Given that participation in the Madrid Forum and Gas Coordination Group is strictly restricted we would welcome a dedicated stakeholder workshop with wide representation to discuss the results. This would also allow GTE to receive more detailed feedback from experts with in the stakeholder organizations.</p> <p>GTE should also encourage written feedback on the draft version of the Winter Outlook each year.</p>
Ten Year Network Development Statement	<p>We welcome the emphasis on stakeholder involvement in the process, which is essential.</p> <p>The first stage of this process should include the publication of the different assumptions being used by each TSO in producing the data that feeds into the GTE+ Ten Year Development Statement/Plan. If there are significant variations between different TSO's assumptions, this should be addressed by GTE.</p>
Capacity Co-ordination	<p>We agree with the objectives, but note that work in this area is limited to analysis (e.g. listing current products, identifying areas for coordination etc) and the publishing of a recommendations report. This work will be completed in 2008.</p> <p>No work is identified for 2009 by GTE. We hope that 2009 will be used to carry out the practical improvements that should be identified in the 2008 recommendations report.</p> <p>An immediate improvement that could be made by GTE members would be to comply fully with the ERGEG GGP for Open Seasons and for Calculation of Available Capacities.</p>
Code on Harmonization of Maintenance Publications	<p>This work looks like a quick win that requires relatively little resource, given that TSOs should already be publishing this information.</p>
IT and Communications Roadmap	<p>The objectives and deliverables seem correct, but it is important that all stakeholders are involved in the decision making process. For this reason it may be more appropriate for the overall roadmap to be agreed in a pan-industry forum with specific experience/expertise in this area, such as EASEE-gas.</p>

**Q4: If delivered in a timely and responsive manner would the programme defined in this document constitute a significant step towards the development of the internal market?**

Answer
Yes, subject to the above remarks. Also as mentioned above, we cannot put enough emphasis on the importance of compliance of individual TSOs with the existing legislation and ERGEG guidelines. GTE clearly has a role to play in this through actively encouraging compliance and providing a forum to share best practice experiences.

**Q5: Do respondents have any additional comments or remarks to make about:**

The proposals to establish ENTSOG	<p>We welcome the GTE initiative to anticipate the establishment of ENTSOG and support its early work on the tasks which ENTSOG will in due course undertake.</p> <p>However we believe it is essential that such a formative role is underpinned not only by strong stakeholder involvement (as noted above) but also by effective TSO unbundling (as is envisaged in the 3rd Package). Effective unbundling will help stakeholders have greater confidence in the process and will reassure them that information they provide in good faith will neither be used for purposes other than as intended nor as a means to obtain unfair competitive advantage.</p> <p>To that end, we would welcome explicit reassurance by individual companies that they will - as a minimum - fully comply with Article 9 &amp; 10 of the current directive, and that they ensure that employees in their work on GTE+ are representing and reflecting the interests of the TSO business(es) only. GTE should actively facilitate provision of such reassurances and representation.</p> <p>As more specific unbundling arrangements are mandated as a consequence of the 3rd Package, GTE should in addition publicly encourage its members towards full and early compliance</p>
The Work Programme envisaged in this document	Subject to our comments above, we welcome the creation of this Work Programme by GTE and in particular the steps that have been taken to consult with stakeholders.
Anything else?	



**Q6: Is there any advice/feedback you would like to offer GTE about how it can best facilitate the transition between today and implementation of the Third Package?**

Effective implementation of the existing EU legislative and ERGEG GGP regulatory guidelines must be a priority where this has not already happened.

Network users have been vocal in highlighting the areas where legislation needed to be strengthened in the Third Package for several years. GTE should continue to look at incorporating these requirements within its work and not wait for the Third Package to be finalized.

**Q7: Would you like to meet with GTE members to discuss the development of ENTSOG consultation and development processes?**

Answer
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Yes
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Please do not feel constrained by the sizes of the boxes above. GTE welcomes comprehensive feedback as critical part of establishing the GTE+ Work Programme