

GIE response to ACER's draft Framework Guidelines on Interoperability and Data Exchange Rules Public Consultation

1. Introduction

GIE welcomes ACER's consultation of the "Framework Guidelines on Interoperability and Data Exchange Rules". GIE is happy to contribute to this public consultation with its views.

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 70 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

2. General Statement

The draft Framework Guidelines on Interoperability and Data Exchange Rules states that "the Network Code developed on the basis of these Framework Guidelines will apply to TSOs, with the aim to reach full market integration. LNG operators and storage operators shall facilitate interoperability and support the provisions related to TSOs laid down in these Framework Guidelines".

GIE, as the association representing transmission, LNG and Storage operators is of the view that the Network Code on Interoperability and Data Exchange Framework Guidelines shall only apply to Interconnection Points, in line with Regulation 715/2009, in particular with article 8(7).

LNG operators and storage operators are already facilitating the interoperability by having built a strong cooperation with the transmission system operators throughout the last years. LNG and storage operators are happy to continue working closely with TSOs to deliver the ultimate goal of the internal energy market.

In view of the tight bonds that already exist between LNG, storage and transmission operators, GIE supports ENTSOG's response for transmission related issues.

GIE considers that the Framework Guidelines should focus on TSOs and their relation with Network Users, whereas cooperation between TSOs and LNG and Storage operators should remain to be a national issue.

In addition the rules applicable to other entry and exit points should be defined at national level, taking into account the technical specificities of the LNG terminals and underground gas storages.