

GIE views to ACER's draft outline of 2017 Work Programme¹

1 Who is GIE?

Gas Infrastructure Europe (GIE) is an association representing the interests of European natural gas infrastructure operators active in natural gas transmission, storage and LNG regasification. GIE is a trusted partner of European institutions, regulatory bodies and industry stakeholders. It is based in Brussels, the heart of European policymaking. GIE currently represents 69 member companies from 25 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.

GIE welcomes the opportunity to provide its views and opinions and hope they will be taken into account in ACER's draft 2017 Work Programme.

2 GIE view to ACER's draft outline of 2017 Work Programme

GIE would like to share the following comments on ACER's draft work programme 2017:

- **Implementation network codes:** GIE appreciates the initiative to involve stakeholders in implementation and amendments of network codes. GIE looks forward to a platform for requests for amendments that will be launched by the end of this year. For stakeholders it is important to know the principles on how such requests will be treated. Who is deciding on what? What is the role of ACER, ENTSOG and the stakeholders? GIE would furthermore like to note that early implementation of network codes is a voluntary process. To ensure broad support among TSOs this process should be initiated by TSOs.
- **Gas Regional Initiatives:** It is for GIE not completely clear – taking into account the conclusions of the Madrid Forum – what role the Gas Regional Initiatives will play in (early) implementation of network codes, and how relevant stakeholders, including GIE members will be involved in the work of the GRIs.
- **ENTSOG methodology:** It is important for decision makers and for stakeholders to fully understand the ENTSOG methodology for cost-benefit analysis of PCIs, summer and winter outlooks, TYNDP, etc. GIE is available for any questions by ACER, ENTSOG and others

¹ E-mail from ACER Press on 5 November 2015: "Alberto Pototschnig, Director of the EU Agency for the Cooperation of Energy Regulators, presented today the draft outline of the Agency's 2017 Work Programme at a public workshop held in Ljubljana. [...] The Director invited all interested parties to express their views and share their opinions on which areas the Agency should focus its efforts on in 2017. The Agency will endeavour to take on board inputs from interested parties that are feasible and in line with its mandate and the available resources."

regarding assumptions made for all infrastructure operators (transmission, storage and LNG).

- **REMIT:** GIE is cooperating intensively with ACER on the implementation of fundamental data reporting for LNG system operators and gas storage operators. We would like to continue the good cooperation in keeping with the roles and responsibilities attributed to ACER, ENTSOG and the scope of an organisation such as GIE.
- **Regulatory oversight ENTSOG:** GIE acknowledges the work ACER and CEER have done on the Bridge to 2025 and GIE has provided input at various stages. Additional competences of ACER should however be defined in the Energy Market Design package which the European Commission will present in 2016.
- **Security of supply:** The work programme for 2016 contains a section on security of supply. GIE agrees that ACER could have a role, on request of the European Commission. But would like to underline the importance of keeping responsibilities on security of supply clear.