

GIE response to Commission's consultation

Establishment of the annual priority lists for the development of network codes and guidelines for 2017 and beyond

About 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 67 members in 24 European countries.

GIE voices the views of its members vis-à-vis the European institutions, 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.

1 Introduction

GIE welcomes the opportunity to answer to this public consultation. The priorities described in this document will be important for the achievement of an integrated, sustainable, competitive and secure European gas market.

Given the scope of GIE activities, GIE will only refer to section 1.2 “Tentative annual priority list 2017 regarding gas network rules” of the public consultation document and to section 2 “Annual priorities beyond 2017” of that document.

GIE agrees with the Commission that development and implementation of network codes and guidelines are not the only important action to be taken in order to integrate the internal energy market. GIE is ready to cooperate with the Commission on all the actions that contribute to the construction of a single, sustainable and competitive gas market in Europe.

2 Answers to consultation's document

2.1 Priorities for 2017

GIE recognises the important steps the Commission, ACER and ENTSOG and other stakeholders have made in realising the network codes on harmonised rules on congestion management procedures, capacity allocation, balancing and interoperability and data exchange.

GIE agrees with ACER's recommendation and shares the Commission's view that there is currently no necessity for developing harmonised rules for gas trading related to technical and operational provisions of network access services and system balancing.

Interoperability Code – gas quality

In general GIE welcomes the new CEN standard for H-gas quality as a basis for a future gas quality harmonization in Europe, facilitating the free trade of gas through the effective interoperability of networks. Nevertheless enforcing gas quality harmonization through the amendment of the Interoperability and Data Exchange (INT) Network Code is not necessarily the most efficient way to remove gas quality barriers as underlined in the 29th Madrid Forum on 6 and 7 October ([link](#)) by the Commission. Any potential introduction of a harmonized standard should be supported by a robust cost benefit analysis and avoid introducing new barriers, unnecessary additional complexity or unnecessary additional costs. GIE supports the Commission's proposal at the Madrid Forum not to pursue legally binding provisions on this matter at this stage and its recognition of the views of stakeholders on this matter.

GIE has provided the views of infrastructure operators (TSOs, SSOs and LSOs) during the stakeholder engagement process organised by ENTSOG and will continue doing this as required.

2.2 Priorities beyond 2017

GIE suggests that further work should concentrate on the implementation of Network Codes and on the monitoring and evaluation of the effectiveness of their measures for the internal gas market.