



Our date  
2009-11-06

Our reference  
ERGEG workplan

Administrative officer  
Davide Rubini

Your date  
2009-11-06

Your reference  
Statoil position

ERGEG

Attn.: Mrs. Fay Geitona  
1000 Brussels - Belgium

**OBJECT: Feedback on European Energy Regulators 2010 Work Programme**

Dear Mrs. Geitona,

We welcome ERGEG's willingness to respond promptly to the requirements of the Third Liberalisation Package and work on its quick implementation matching the purpose and the pace of other stakeholders, in particular GTE+, whose future activities are closely related to those of European Energy Regulators.

We value the possibility to send our comments on your workplan for 2010 as this allows for coordination among stakeholders' action and for enhancing the understanding of the potential evolution of the single market. We appreciate the information provided and we would like to make the following remarks:

- Statoil applauds ERGEG's ambitious workplan, working towards the timely realisation of the single market for gas and electricity. At the same time, the industry must ensure stability where practicable and avoid continuous adjustment, which might otherwise occur without appropriate coordination of regulatory change. This may entail some further prioritisation among the activities foreseen;
- We understand that the work on the Framework guideline on CAM and CMP should have the function of pilot activity in order to establish procedures and work methodologies that will then be used to develop other framework guidelines. For this reason, given the obvious synergies between capacity allocation and congestion management procedures with gas balancing rules, we would recommend postponing work on the Framework guideline on gas balancing rules. A public consultation could precede any further work during the second quarter of 2010. Alternatively, the foreseen public hearings and workshops could be postponed so to take stock of the experience gained while working on the CAM and CMP guidelines;
- Given the importance to industry participants of accessing primary firm capacity, the review of intra and inter-regional coordination of open seasons should include public workshops and consultations, to enable stakeholders to learn from previous open seasons and thus better inform future procedures.
- In dealing with CAM, CMP and open seasons ERGEG should also maintain the ambition to go beyond what the bare minimum legislative requirements imposed by ACER's mandate are and strive for harmonisation of procedures at all entry and exit points through open and thorough cooperation with all relevant stakeholders;
- Workshop sessions on the benchmarking report on storage tariffs and the response on transparency in energy trading would also be beneficial;
- The workshop held in Brussels on the 10-year network development plan has shown that different views still exist with respect to how the plan should be built and what information it should contain. For this reason we suggest that ERGEG considers holding a public consultation in preparation of the workshop already foreseen in the first quarter 2010.
- Work on market supervision and wholesale trading license may also benefit from wider stakeholders involvement;
- Finally, it would be useful to finalise the Conclusion paper on regional initiatives after their Status review.

We remain available for further clarification should you find it necessary.

Kind regards

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