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ERGEG Public Consultation on Draft Guidelines for Good Practice on Open Season Procedures (C06-GWG-29-05)

Comments from RWE Energy AG

RWE Energy AG is pleased to comment on the ERGEG Draft Guidelines for Good Practice on Open Season Procedures.

Generally, we welcome the ERGEG approach to clarifying current guidelines and requirements on open season procedures to ensure that such procedures are conducted in a non-discriminatory and transparent manner resulting in efficient outcomes.

We generally support the proposals for the structure of open season processes as stated in the draft guidelines. However, with regard to the information provision to potential users (Paragraph 20), we would like to give two comments:

Firstly, we believe that the publication of the estimated cost of the project is not an essential information that shippers would require for indicating capacity requests. Moreover, if during open season, the market demand turns out to be higher than expected, the size of investment could still be adjusted by the project sponsor so that the communication of an initially planned size of investment would add to confusion rather than being helpful for potential shippers.

Secondly we would like to point out that in a competitive environment, e.g. transit pipelines in Germany, the publication of the methodology to derive tariffs is not common practice since these information constitute business secrets. In cost-based regimes, all information on tariff methodologies are available to the regulatory body anyway which makes an extra publication redundant.

Kind regards,
RWE Energy Aktiengesellschaft

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