

Council of European Energy Regulators (CEER)
Rue le Titien 28
1000 Brussels
Belgium

Brussels, 7 January 2011

CEER Vision Paper for a conceptual model for the European gas market

Dear Madam/Sir,

In respect to the conceptual model for the European gas market EASEE-gas, the European Association for the Streamlining of Energy Exchange – gas, would like to draw your attention to the work EASEE-gas has done in the past to streamline both physical and commercial gas transfer across Europe.

Since 2002 the members of EASEE-gas, representing all segments of the gas industry, have developed and approved 14 “Common Business Practises” (CBPs). The CBPs intend to simplify and harmonise business processes between stakeholders constituting a set of recommendations in regard to process handling, messages exchange and technology standards.

All CBPs issued by EASEE-gas have been the result of important work by various working groups with the participation of experts from all segments of gas industry in Europe.

At the 18th Madrid Forum EASEE-gas presented the results of the recent conducted survey on the implementation of EASEE-gas CBPs. Please find the presentation attached to this letter, a detailed report can be downloaded from www.easee-gas.org.

The results illustrate that the implementation of most of the jointly developed CBPs is progressing in Europe. In this respect EASEE-gas strongly recommends to support the recommendations as described in the CBPs and to avoid contradictory rules on national and European level that would endanger the on-going harmonisation process in Europe.

One example, which also refers to the 4th question in the Call for Evidence, is the harmonisation of the gas day. This issue is defined in a CBP (2003-002/02 Harmonisation of the Nomination and Matching Process) and has already been implemented in several European countries. Evidently changes with regard to already implemented common business practices would be counter-productive as they will lead to additional costs, mainly in the area of IT applications, while at the same time further delaying the creation of an integrated gas market.

With regard to the 3rd question we also would like to highlight the importance of European wide harmonised gas quality specifications for which a CBP (2005-001/02 Harmonisation of Natural Gas Quality) has already been approved in 2005.

EASEE-gas is of the opinion that the jointly developed CBPs should be seen as basic building blocks for the creation of a European gas market as they could be easily fitted into a target model.

EASEE-gas is looking forward to further support the work on a conceptual model for the European gas market, especially in the area of interoperability and IT and communication standards and protocols. In those fields EASEE-gas already proven that it provides the knowledge and expertise to develop concrete solutions for the gas industry as a whole.

Yours sincerely,



Pascal De Buck