

GTE answer to ERGEG Public Consultation on gas transparency monitoring

(11 January 2008)

Introduction

GTE recognizes the importance of transparency for the development of the European internal gas market. In this respect, GTE considers the ERGEG transparency monitoring as a valuable activity to evaluate the transparency tasks that have been completed firstly in respect of the requirements of the Regulation 1775 and secondly to identify those tasks that are required in order to meet the aspirations of the market.

GTE provided some suggestions to the work performed by ERGEG at the Madrid Forum XIII last October and it is pleased to see that some of them have been taken into account in this public consultation. Therefore GTE welcomes this further opportunity to comment on transparency issues with a view to actively contributing in the market opening process.

In answering to ERGEG public consultation on gas transparency monitoring, GTE would like to recall some general principles that have necessarily to be considered when monitoring the existing transparency requirements and setting new ones. As far as the specific issues of public consultation are concerned, TSOs will directly comment on them where they deem it is necessary.

General Comments

GTE acknowledges that the provision of information requested by the market participants is crucial to better facilitate the market functioning. However such information release should be subject to three qualifications:

- the information release will not prejudice any TSO customer or other industry stakeholder,
- the information release will not prejudice the TSO, and,
- the information provider should be rewarded for the publication.

Moreover GTE would like to emphasize that in any case appropriate cost-recovery mechanisms for both the system development and any ongoing costs associated to the provision of such information need to be considered.

Finally GTE would like to outline the need to foresee an appropriate time lag between the setting of additional transparency requirements to those already foreseen by Regulation 1775 and the deadline for TSOs to make this information available to the market; this is necessary as the systems to provide such information to the market could be not in place and TSOs might require time to develop them.