

Natalie McCoy  
Secretary General  
CEER

1<sup>st</sup> August 2012

Dear Natalie,

Eurogas has considered CEER's proposed 2013 Work Programme. Eurogas finds it a clear and well organized proposal, offering added-value in its planned deliverables. In particular Eurogas endorses its emphases on the importance of energy customers in the development of energy policy, to which objective Eurogas also dedicates increasing resources, reflecting the key role that suppliers' interactions with customers play in reaching a better understanding of their needs.

Eurogas has only some few general points/questions to raise.

As section 3 notes, CEER is actively engaged in a range of EU initiatives related to customer issues. To date Eurogas, which is also involved in main aspects of the Commission led work, is confident in the process synergies but all steps have to be taken to preserve these. For example, will the CEER advice on data management link with the ongoing work on this issue in the smart-grid Task Force, and will the planned review on customer access to the cost of energy and efficiency schemes take on board the outcomes of the DG SANCO led work on price transparency? It could be useful to introduce cross-referencing in the descriptions.

ACER under Article 11 of Regulation EC713/2009 has a duty to monitor the electricity and gas markets. ACER's Work Programme addresses this task, but will CEER contribute to this work and how will any recommendations link with existing and ongoing work streams and guidelines?

How will the monitoring exercise on the implementation of the Gas Target Model be carried out? Basic requirements to implement the Gas Target Model are still missing in various Member States. CEER should concentrate on identifying these and promoting their implementation, otherwise progress towards the Gas Target Model will not be achievable. Also, after the last Madrid Forum, the understanding of Eurogas was that the Model's development would largely follow on activities in the GRIs, within ACER's sphere of activities. Will this be a joint exercise?

Eurogas considers that the information exercises planned by CEER will be of value in enhancing understanding of market progress, alternatively indicating where further actions may be needed, but it is generally not clear to what extent stakeholders will be involved in the reviews. Perhaps this could be clarified in the description, e.g. on Activity 7, on DSO unbundling rules.

Finally, Eurogas would welcome clarification on Activity 17 on incremental capacity, linked with 18 on Open Seasons. Eurogas agrees on the importance of clarifying issues related to signals on incremental capacity, and is pleased that work on this issue is already underway. Eurogas also agrees that it is necessary to revise the GGPOS. What, however, is the integrated proposal referred to in 17, which is mentioned as already underway? Eurogas thinks the right approach is to assess next year what follow-up may or may not be necessary on this issue.

I am of course available, if you wish to discuss any of the above.

Yours sincerely,

Margot