



Gas Regional Initiative Coherence and Convergence – An EREG Evaluation of Comments Paper

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1 Executive summary

- 1.1. The purpose of this paper is to summarize the views ERGEG (European Regulators Groups for Electricity and Gas) received in response to the Gas Regional Initiatives (GRI) Coherence and Convergence Consultation Document, the GRI Coherence and Convergence – A Public Consultation Paper [E07-GRI-01-05] (hereinafter referred to as “Consultation Document”).
- 1.2. ERGEG is pleased with the level of stakeholder engagement and is grateful for the number of responses that have been submitted regarding this consultation.. The regulators within ERGEG are encouraged and feel that the responses indicate that the GRI process is making progress into the right direction. ERGEG feels that the consultation indicates the importance of further progress within the GRI process
- 1.3. After further coordination of the issue, ERGEG will publish a conclusions paper later this year (the GRI Coherence and Convergence – An ERGEG Conclusions Paper [E07-GRI-01-05.b]).
- 1.4. Most of the questions in the Consultation Document were seeking views on whether or not there was sufficient consistency between different aspects of the three Regional Energy Markets (REMs) so as not hinder coherence and convergence between them in the future. Generally, stakeholders viewed the process as sufficiently consistent. However, there were aspects of the GRI process where some respondents saw a danger of inconsistencies arising that might hinder coherence and convergence in the future. According to some respondents, areas such as interoperability and interconnection were at risk of developing too differently across the REMs.
- 1.5. There was a view that not enough progress had been achieved in some areas such as capacity allocation (as well as facilitating capacity investment) and transparency.
- 1.6. Whilst many respondents appreciated that different markets require different arrangements, there was an overall view that more central coordination should be implemented. This could simply be improved communication between the three REMs or the rolling out of some valuable achievements of one REM into the others REMs.
- 1.7. The Electricity Regional Initiatives (ERI) has conducted a similar stakeholder consultation The ERI Coherence and Convergence Report – An ERGEG Public Consultation Paper [E07-ERI-05-03] was published on 18 July 2007. The ERI Coherence and Convergence Report – An ERGEG Evaluation Paper” [E-08-ERI-11-03] and the ERI Coherence and Convergence Report – An ERGEG Conclusions Paper [E-08-ERI-11-03] were published on 21 February 2008.

2 BACKGROUND

2.1. On 8 October 2007, ERGEG launched a public consultation on coherence within each of the three REMs of the Gas Regional Initiatives (GRI) and the eventual convergence to a single European energy market. The REMs were established in order to accelerate gas market integration between countries and lead to greater coherence within the gas market across all Europe. Table 1 sets out the membership of the three REMs. This consultation process provides the opportunity to assess overall progress within the REMs, to identify the areas of priority development and to consider whether adopted solutions would impact overall convergence of the EU gas market.

Table 1 – Gas Regional Energy Markets (REMs)

Regional Energy Market (REM)	Member countries	Lead Regulator
North West (NW)	Belgium, Denmark, France, Germany, Ireland, Netherlands, Sweden, UK, Norway (observer).	DTe (Netherlands)
South- (SSE)	Austria, Czech Republic, Greece, Hungary, Italy, Poland, Slovenia, Slovakia, Romania, Bulgaria (invited).	E-Control (Austria) AEEG (Italy)
South (S)	Spain, Portugal, France.	CNE (Spain)

2.2. The Consultation Document established that REMs have already started to pursue similar priority topics in similar ways, allowing for further integration later on. However, as a first step, it was suggested to establish coherence and convergence within the REMs since it is easier to establish integration between countries which have to address more common issues in the gas market. Additionally, the ERGEG's consultation emphasized the need to ensure that barriers across the REMs are avoided in order to meet the ultimate goal of a single market. The document concluded that in general there is good consistency in the priorities across the REMs. However, some differences have been identified in solutions that have been developed.

2.3. Each REM has developed its own priorities, aiming to develop and harmonise the gas market across countries within the REM. Therefore this consultation aims to assess whether the solutions developed within the individual REMs are coherent across the other REMs as well. There are already some common priorities across all REMs. These include:

- enhancing the efficient use of existing pipeline capacity;
- facilitating development of new interconnection capacity;
- improving transparency and interoperability between networks; and

- developing gas hubs.

2.4. The ERGEG’s consultation closed on 16 December 2007 and received 15 responses, 3 of which were confidential. Table 1 shows the list of respondents and their country of origin. All non-confidential responses have been published on the ERGEG website. ERGEG would like to thank all these organisations for their valuable contribution towards coherence and convergence issues in the gas market.

Table 2 – List of properties

Respondents		Country
BGN	Bord Gáis Networks - semi-state body operating networks and running supplying gas	Ireland
Centrica	Owner of supply and gas storage companies	UK
EKPIZO	Consumers Association (translates as 'the Quality of Life')	Greece
Enel	Ente Nazionale per l'energia ELettrica – electricity and gas distributor and supplier	Italy
Eni	Gas producer and supplier	Italy
EuroGas	The European Union of the Natural Gas Industry	EU
Gas Natural	Gas distribution and supply company	Spain
GEODE	The association of European independent distribution companies of gas and electricity.	EU
GTE	Gas Transmission Europe association	EU
IFIEC	International Federation of Industrial Energy Consumers	EU
Sedigas	Spanish Association of the gas industry	Spain
SSE	Scottish and Southern Energy, gas supply, distribution and transmission company	UK
<i>Confidential</i>		Germany
<i>Confidential</i>		Germany
<i>Confidential</i>		Norway

3 EVALUATION OF RESPONSES

Respondents welcomed the opportunity to comment on the GRI Consultation Document. It was appreciated as an opportunity for gas market participants to give their opinions on progress made as well as on potential issues which may arise within each REM as well as across REMs.

Many expressed their commitment to continue contributing to the process and expressed their willingness to contribute towards the future GRI process and to engage with their respective REMs. This stakeholder engagement is crucial to the success of the GRI process.

A general message that seemed to emerge from most responses is that activities in the REMs are currently not creating significant inconsistencies that risk hindering the coherence and convergence of the REMs in the future. However, there also appeared to be a view that for many areas it would be appropriate to establish more common principles to be followed within all REMs and that lessons learnt in one REM should be communicated effectively to all other REMs.

3.1 **General comments on consistency in the common priorities across the REMs and possible similarities within gas and electricity markets:**

3.1.1 Questions in the Consultation Document:

- ◆ Do you agree that there is sufficient consistency in the common priorities that are being looked at across the three regions to ensure that no real barriers are being created for the future integration of the regions? If not, please explain why.
- ◆ Given the factors outlined above [paragraphs 3 to 10 in the Consultation Document], do you agree that the issue of coherence and convergence within regions rather than between regions is more important as a first step in gas? If not, please explain why.
- ◆ Do you think there are similarities and/or interactions between the electricity and gas sectors that should specially be taken into account when assessing the coherence and convergence level among regions? Please specify which similarities and/or interactions that should be taken into account.

3.1.2 EREGG statement in the Consultation Document:

- 3.1.2.1 The ERGEG Consultation Document indicated the view that currently there was a good degree of consistency between the different REMs. Differences in priorities could be explained by the variance in market conditions such as their maturity. It is ERGEG's ambition to ensure that the regional priorities run alongside a vision of what the single market might look like.
- 3.1.2.2 The Consultation Document expressed the opinion that there were significant differences between the Electricity Regional Initiatives (ERI) process and GRI. These are due to the size of the REMs and the different stages of development in the markets.
- 3.1.2.3 ERGEG concluded that coherence and convergence within REMs rather than across REMs was more important as a pragmatic first step in gas.

3.1.3 Stakeholders' responses to the Consultation Document:

- 3.1.3.1 The majority of respondents agreed that there is sufficient consistency in current priorities to ensure that no real barriers exist for the future integration of the REMs. One stakeholder pointed out there was a danger that the drive towards increased consistency might lead to arrangements that may not be suitable to individual REMs. (It is important to note at this stage that the responses to the questions in the remainder of the document highlight areas where there may be a risk of such inconsistencies).
- 3.1.3.2 There was almost full agreement amongst respondents that coherence and convergence within REMs rather than between REMs is more important as a first step in gas. Such a bottom up approach was generally regarded as a pragmatic way towards achieving a situation in which one can tackle coherence and convergence between REMs.
- 3.1.3.3 Nevertheless, ten respondents noted that the final aim, creating a common EU market, should not be forgotten and that more cross-regional regulatory coordination would be beneficial. There appeared to be a desire for regional activities to be compared and for the resulting experiences and conclusions to be shared regularly. Three stakeholders would value agreeing a minimum set of shared principles across all REMs in order to ensure that the three REMs remain consistent and compatible in the long term.

3.1.3.4 Several items that are common to both electricity and gas were mentioned by respondents. These include interconnection capacity, Use-it-or-lose-it arrangements and the allocation of capacity rights (in the case of electricity this is becoming comparable to trading the commodities themselves). The All Island Electricity Market in Ireland has been mentioned as a successful example of cross border cooperation, which could inspire a similar solution for the gas market: the All Island Gas Market. Regarding most of these issues to this date, more progress has been achieved for electricity than for gas markets.

3.1.3.5 Respondents stated that lessons learnt from the ERI process should be taken into account within the GRI process. However, several companies pointed out that similarities should be taken with caution due to the explicit differences between electricity and gas markets.

3.1.4 ERGEG comment on stakeholders' feedback:

3.1.4.1 ERGEG is encouraged by the responses received from its stakeholders, because most stakeholders appear to support and actively contribute towards the GRI approach and consider it a pragmatic way towards the ultimate goal: a European gas market. ERGEG appreciates that respondents have identified the need to learn lessons from the ERI process and, where appropriate, apply these towards its work on the GRI. Similarly, there may be opportunities for regulators involved in the GRI process to share their experiences with the ERI. ERGEG will also take into account the wish of the stakeholders for more cross-regional regulatory cooperation within the GRI.

3.1.4.2 It is worth pointing out common principles have been agreed across the different REMs. These have been referred to in the introduction. The GRI Task Force will consider how to best communicate these to our stakeholders.

3.2 **General comments on interconnection and capacity**

3.2.1 Questions in the Consultation Document:

- ◆ Do you think that the approaches being taken across three regions towards interconnection and capacity are sufficiently consistent to avoid creating problems for the integration of the three regions in the future? If not, please give specific examples of what could be done differently?

3.2.2 EREGG statement in the Consultation Document:

Two of the common goals across the REMs refer to capacity: enhancing the efficient use of existing pipeline capacity and facilitating development of new interconnection capacity. All REMs recognise that capacity issues represent a key barrier towards creating a regional and eventually a single European market, although some differences exist in approach. It is important to ensure that these different approaches are consistent with each other.

3.2.3 Stakeholders' responses to the Consultation Document:

3.2.3.1 Stakeholders indicated that access to capacity is possibly the greatest barrier to a functioning European market and advised to particularly prioritise this issue. Some respondents stated that the current approaches may not be sufficiently consistent to avoid problems regarding the integration of the REMs in the future. Apparently, one reason for this would be a lack of principles across the REMs. The pace of the developments in this area varies amongst REMs and the continuing lack of interconnection capacity between France and Spain has been cited as a particularly significant example.

3.2.3.2 Several companies suggested that there was a need for coordinating an investment plan which champions specific priority interconnector projects. Some mention the need to “create an investment climate which enables this sort of investment”. Some suggest taking more practical steps to enhance interconnection capacity at particular points.

3.2.3.3 Some of the stakeholders were disappointed with the extent of progress made on capacity. These respondents felt that the interconnection between France and Spain in the South (S) REM considerably influences the overall progress of the REM, as interconnection capacity is the first priority of the S REM and slows down other areas of work.

3.2.3.4 Some suggested that defined minimum common principles should be established to ensure market integration. Others went further and suggested that the harmonisation of capacity, monitoring, charging structures and methodologies within transmission systems throughout the Europe was needed. However, some respondents disagreed arguing that harmonisation across REMs might destroy local efficiencies which reflect local demands and circumstances.

3.2.3.5 Amongst those respondents in favour of more harmonization and common principles across Europe there was disagreement about what kind of common rules should be adopted. Suggestions included: rolling out throughout Europe an Entry-Exit tariff system; the principle of Use it or Lose it; harmonisation of capacity allocation mechanisms, harmonisation of capacity products; harmonisation of the charging structure; a standardised bulletin board to identify best practice across REMs; drafting of minimum common principles on capacity; to guarantee bilateral agreements and auctions; developing day ahead auction pilot projects; roll out to all REMs of the standardised bulletin board; the one-stop shop initiative; auctions (open seasons); ensuring the availability of equal levels of capacity on both sides of the border.

3.2.4 EREGG comment on stakeholders' feedback:

EREGG appreciates that building new capacity and making existing capacity available is a precondition for the achievement of some of the other goals. The consultation showed that there are many different views on how best to achieve this and further discussion is needed at GRI Task Force (GRI TF) and REM level. This will then feed into EREGG's work towards the overall vision of the goal of the single European energy market. In the S REM, regulators are working on capacity allocation mechanisms and on interoperability. As a consequence of this, concrete regulatory improvements have already been achieved concerning the interconnection between France and Spain. This should guarantee a non discriminatory capacity allocation to the occasion of the coming capacity increase.

3.3 General comments on transparency

3.3.1 Questions in the Consultation Document:

- ◆ Do you think that the approaches being taken across three regions towards transparency are sufficiently consistent to avoid creating problems for the integration of the three regions in the future? If not, please give specific examples of what could be done differently.
- ◆ Do you think there would there be benefits in rolling out the note on "less than 3" to the other regions? If so, are there any regional differences that should be taken into account?

3.3.2 EREGG statement in the Consultation Document:

3.3.2.1 All three REMs have identified transparency as one of their key priorities to help facilitate greater market integration and are working towards greater consistency and accessibility of information. Stakeholders have already been consulted on their requirements regarding this issue in the REMs. Improvements have been made regarding transparency of LNG terminals (S REM) and interconnectors - in the North West (NW) and South (S) REMs. The implementation of the standardised trading platform for capacity in the South /South East (SSE) REM will also deliver improvements regarding transparency. The NW REM TSOs have submitted project plans which indicate that significant improvements, particularly regarding interconnector capacity, will be made this year.

3.3.2.2 In the NW REM regulators have developed a guidance note for the application of the “less than three rule”. The note sets out to regulators how exemption requests to this rule should be treated and how some information can be made available even where there are less than three users. Implementation of these guidelines is shortly to be reviewed.

3.3.3 Stakeholders’ responses to the Consultation Document:

3.3.3.1 There appeared to be agreement amongst respondents that approaches taken in the three REMs to improve transparency are sufficiently consistent to avoid problems for the integration of the REMs in the future.

3.3.3.2 Many stakeholders stated that a level playing field was highly dependent on the level of transparency in the market. They suggested that more needs to be achieved in this area and European wide binding rules should be agreed. It was also suggested to harmonise information publication requirements, publishing it in a uniform format and common language. Data should be available to all market participants as close to real time as possible.

3.3.3.3 Others suggested that transparency levels should differ according to the markets where they are applied. Here respondents argued that too strict a transparency policy could deter potential market participants, and information such as future capacities, demand or contract durations should be available only in suspected cases of market abuse.

3.3.3.4 Five respondents were in favour of rolling out the 'less than 3' note (developed in the NW REM) to all REMs, and some argued that aspects of it should be changed. Several respondents expressed concern about the rule being abused and suggested abolishing the rule, or limiting the application of the rule. It was also expressed that even if there are less than three players the information disclosure still should be binding as this could help to tackle monopolistic or duopolistic behaviours. One stakeholder expressed the view that the rule should be closely monitored.

3.3.4 ERGEG comment on stakeholders' feedback:

3.3.4.1 ERGEG views transparency as an area that has benefited particularly from the regional ("bottom up") approach. Whilst ERGEG agrees that transparency is an important issue and that significant improvements can be made in all regions, further progress can be made using the bottom up approach. This is due to the different stages of market development.

3.3.4.2 ERGEG publicly recommends the deletion of the minus three rule and this recommendation has been taken over in the 3rd package¹. The roll out of the less than three guidance from the NW REM to other REMs would therefore seem like a sensible step towards hindering abusive application of this rule. Such a step will therefore be considered further.

3.4 General comments on interoperability (including gas balancing)

3.4.1 Questions in the Consultation Document:

- ◆ Do you think that the approaches being taken across the three regions towards interoperability (including balancing) are sufficiently consistent to avoid creating problems for the integration of the three regions in the future? If not, please give specific examples of what could be done differently?
- ◆ Will the development of a regional Entry-Exit system in the South-South East (SSE) region lead to any difficulties of convergence with other regions at a later stage? If so, how could these be overcome?

3.4.2 ERGEG statement in the Consultation Document:

¹ 3rd Legislative Package Input - Paper 6: Transparency requirements for Electricity and Gas – a coordinated approach – An ERGEG public document [C07-SER-13-06-6-PD].

3.4.2.1 All three REMs have priorities directly relating to interoperability (including gas balancing). The key focus on these priorities is to enhance the integration of operators within each of the REMs and in many cases to standardise operational procedures.

3.4.2.2 The SSE REM has focused work on a potential regional Entry-Exit tariff system. Regulators are currently assessing a simulation of such a tariff system. The regulators of this REM are also working with TSOs on removing barriers to the implementation of Interconnection Point Agreements (IPAs) and Operational Balancing Agreements (OBAs). The S REM is focusing on the French-Spanish interconnection point. Shippers have conducted a study to identify interoperability problems to which the TSOs will respond.

3.4.3 Stakeholders' responses to the Consultation Document:

3.4.3.1 Most respondents stated that the approaches were sufficiently consistent between the different REMs and were unlikely to pose a barrier to coherence and convergence between REMs in the future.

3.4.3.2 However, one stakeholder characterised this area as the least consistent. As a solution the market-based daily balancing system and the extension of Operational Balancing Agreements (OBAs) developed in the SSE and NW REMs across all Europe were recommended.

3.4.3.3 Some respondents recognised that some issues that could arise due to the development of an Entry-Exit tariff system in the SSE REM, but most stakeholders do not think that this could be an issue for coherence and convergence between REMs in the future. The concerns mentioned included the creation of inconsistencies between REMs, a requirement for greater coordination of tariff mechanisms, the distribution of tariff income and distance dependent components that may be necessary in such a regime.

3.4.3.4 Numerous companies drew attention to the benefits of expanding the Entry-Exit tariff system across Europe rather than just one REM. Additionally, it was suggested that in order to ensure planning reliability and security of supply comprehensive exemptions for new infrastructures should be granted.

3.4.4 ERGEG comment on stakeholders' feedback:

It is ERGEG's view that this is an area where further harmonisation may be required. There have already been concrete regulatory improvements concerning interoperability in the S REM. The regulators within the

REMs and within the GRI Task Force will have to monitor the situation and act between different REMs in a coordinated manner.

3.5 Comments on development of Gas hubs

3.5.1 Questions in the Consultation Document:

- ◆ Do you think that the approaches being taken across the three regions towards the development of gas hubs are sufficiently consistent to avoid creating problems for the integration of the three regions in the future? If not, please give specific examples of what could be done differently.
- ◆ Do you think that the more regional approach to developing hubs in the South-South East region will lead to any difficulties of convergence with other regions at a later stage? If so, how could these be overcome?

3.5.2 EREGG statement in the Consultation Document:

Liquid and transparent gas hubs are an important foundation for the development of efficient and effective markets. The ability to trade between hubs, with no barriers, is crucial to market integration. There are significant differences in the number and development of gas hubs across the three REMs – which are mainly due to differences in market development across the three REMs. Work is being undertaken in all three REMs on the development of gas hubs.

3.5.3 Stakeholders' responses to the Consultation Document:

- 3.5.3.1 All respondents agreed that the current approaches on the development of gas hubs in the different REMs are sufficiently consistent. One of the companies recommended aiming for greater liquidity at national hubs as a first priority and other respondents recommended establishing a one-stop-transport mechanism and taking the balancing market to the hub.
- 3.5.3.2 Most respondents did not comment on whether or not a more regional approach in the SSE REM would lead to difficulties of coherence and convergence with other REMs in the future. However, those who stated their opinion did not see any issues with the approach.

3.5.3.3 One respondent made the point that the development of gas hubs would be a logical step following the other common GRI aims (better using existing pipeline capacity, facilitating the development of new interconnection capacity, improving transparency and interoperability between networks). Liquid gas hubs may emerge naturally once the previous three goals have been achieved.

3.5.4 EREGG comment on stakeholders' feedback:

EREGG feels encouraged by the responses and appreciates that creating liquid gas hubs is an important part of a well functioning gas market. Creating the right environment for such hubs to develop by making progress on a range of REM priorities is crucial.

3.6 Other issues

3.6.1 Questions in the Consultation Document:

- ◆ Would there be benefits in the MoU being rolled out across the other two regions – or are there adequate arrangements already in place? If it was rolled out, would there be any barriers to doing so and how could they be overcome?

3.6.2 EREGG statement in the Consultation Document:

The regulators in the NW REM have developed a Memorandum of Understanding (MoU) which is meant to promote greater cooperation between regulatory authorities. It is intended to fill a regulatory gap that exists within the current legislative framework. The MoU has been signed by all regulators in the REM on 25 October 2007.

3.6.3 Stakeholders' responses to the Consultation Document:

All stakeholders responding to this question favoured rolling out the MoU and suggested its implementation across all three REMs. Some stakeholders advised monitoring the progress of the MoU in order to determine its wider value.

3.6.4 EREGG comment on stakeholders' feedback:

EREGG welcomes the favourable response to the notion of rolling out the MoU more widely. Sharing experiences of implementation of the NW MoU with the other regions will help further consideration of this.

3.7 Additional points raised in the responses

3.7.1 Stakeholders' additional comments on the Consultation Document:

3.7.1.1 Some respondents emphasised the need for ERGEG to publish regular summaries of GRI activities, which would be presented before changes are implemented. Also, creating a dedicated team which would monitor and coordinate the works in order to guarantee the adoption of a common framework has been suggested.

3.7.1.2 One stakeholder mentioned the formation of a regional ISO (R_ISO) and its potential to create functioning REMs and eventually a single European energy market. He encouraged ERGEG to take this idea forward.

3.7.1.3 One respondent encouraged ERGEG to reconsider and improve the GRI common priorities.

3.7.2 ERGEG comment on stakeholders' feedback:

3.7.2.1 The GRI section of the ERGEG website contains general information on the GRI process, the organisational structure, fact sheets and news. Interested parties have the opportunity to receive ERGEG newsletters about the GRI process by subscribing to them on the ERGEG Regional Initiatives website. The Regional Initiatives Annual Conference on 27 February in Brussels will provide an opportunity to discuss the more strategic aspects of the overall GRI process and a Regional Initiatives Annual Report is published before this conference. In addition to those opportunities (facilitated by the secretariat and the GRI Task Force), the lead regulators of the individual REMs organise regular Stakeholder Group (SG) and Implementation Group (IG) meetings.

3.7.2.2 The regulators are continually seeking ways to improve the running of their REM. One aspect of this challenge is to get the balance between the need to communicate steps to stakeholders on the one hand and the ability to cope with the workload generated by procedural and reporting requirements on the other hand right.

3.7.2.3 ERGEG realises that stakeholder involvement is crucial to achieve progress within the GRI progress. Therefore we seek their views in consultations like this one and respond to these as well as incorporating the responses in our strategic thinking. This will also be shown in the forthcoming Conclusions paper to this consultation.

3.7.2.4 CEER will soon publish/ has published a response on the R_ISO proposals.

4 CONCLUSION

- 4.1 ERGEG is encouraged by the number of responses received to this consultation. ERGEG considers the responses to be supportive of the overall GRI strategy.
- 4.2 The regulators within ERGEG will consider ways to improve coordination between the REMs of the GRI as well as between GRI and ERI. ERGEG will continue to prioritise work on capacity allocation and on facilitating investment in new capacity. ERGEG believes that significant progress is being made on transparency in the NW REM and ways to make the other REMs benefit from that will be considered. ERGEG recognises the need to communicate between the REMs on interoperability in particular. Specifically, rolling out the MoU as well as the Less than three guidance to other regions will be further considered.
- 4.3 As a next step the regulators in the GRI Task Force, in the Regional Coordination Committees and in the Gas Focus Group will look at the consultation responses and draw conclusions on how this will affect the GRI strategy. Those will then be published in a conclusions paper later this year (the GRI Coherence and Convergence – An ERGEG Conclusions Paper [E07-GRI-01-05.b]).