

General comments GTS about the report/survey

GTS observes that the report contains both information on the compliance of TSO's with transparency provisions and recommendations to increase transparency. GTS put forward that first shippers should be consulted (what information do shippers actually need?) before recommendations can be formulated.

GTS observes that the answers to the questionnaire have been provided by the TSO's. GTS put forward that idealistic the information should be gathered by NRA's using an unambiguous set of criteria.

GTS put forward that the report is incomplete, e.g. the report contains no "analysis of responses by means of aggregation", and the survey contains categories such as "empty cell" or "not known".

GTS finds it confusing that for all questions "yes"=green and "no"=red", regardless whether the question is positive or negative formulated. For some questions the answer is yes, but the color "orange" is used. (DTe: some questions have been answered by DTe with "yes and no" because the question/answer was multi-interpretable, ERGEG changed these answers in "yes", but used the color orange).

Suggestions for adjustments of the report/survey

3.3. (Does the TSO offer the following services online - Information on the balancing status of network users). Answer should be "yes", with the remark "GTS does provide information, but network users regard this information as insufficient"

8.3 (Does the TSO publish for all relevant points the maximum technical capacity for exiting the system in counter flow - without charge). Answer should be "yes" (GTS provides this information without charge).

8.6 (Does the TSO publish for all relevant points the available firm capacity - on a regular/rolling basis? & online?). The answer to both questions should be "yes" (GTS provides this information online on a regular/rolling basis).

8.9 (Does the TSO publish online daily updates of available short-term services (day/week ahead)?). GTS states that the online so-called "click and book" does provide (more) than daily updates on real time available capacities. (DTe: answer should not be changed, since multiple shippers have indicated that this is not the case).

8.14 (Are the relevant points approved by your regulatory authority?). The answer should be "yes".

9.1 (If yes, does the TSO publish aggregated information on available capacities (e.g. traffic light system) without publishing numerical data expected to contravene confidentiality?). GTS has put forward that they recently have a traffic light system, so that the answer should be "yes".

9.1 (If yes, has the exemption been authorized by the regulatory authority?). Answer should be "yes, informal". A formal decision has not yet been taken.

9.2 (Does the TSO limit publication of information on the capacity situation for certain points of his system although there are more than 3 shippers?). Answer should be "yes, for storage and domestic points".

I hope that these comments and suggestions for adjustments can be taken on board in the new report. If you have any questions, please let me know.

Kind regards,

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