

Public Consultation

on

The Bridge beyond 2025

PC_2019_G_06

Evaluation Report

19 November 2019

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1. INTRODUCTION

1.1 Background

In July 2019, ACER launched its consultation paper on “The Bridge beyond 2025” as part of a process conducted by European energy regulators in support of the European Commission, to consider actions and possible legislative proposals – notably related to the gas sector. The Consultation Paper explored a set of policy issues, linked in particular to market design and targeted regulatory measures. It built upon the reflections presented in CEER’s Consultation Paper on Regulatory Challenges for a Sustainable Gas Sector (March 2019) and the responses to it provided by stakeholders. The ACER consultation addressed similar topics to the CEER one, generally in more depth, but did not cover all of the same CEER topics.

In the meantime, among other things, a new European Commission has taken office (2019-2024), and the letter of appointment of the new Energy Commissioner has been published which emphasises the importance of affordable, secure, reliable and clean energy. Notably, the letter refers to the role of gas in the transition, mentioning carbon capture and storage and the full use of LNG.

Broad debate continues in the Madrid Forum, and beyond, on the future role of gas in a decarbonised society. Recognition of the need to define decarbonised and renewable gas is widespread, with the Florence School of Regulation leading a platform on classification of renewable gasses.

1.2 Purpose and objectives

As noted in the ACER Consultation Paper, the context for these considerations includes increased electrification of economic activities and extensive decarbonisation of the energy sector, leading to reductions in the use of unabated natural gas (and other fossil fuels), but with substantial uncertainty over the pathway to these reductions and the extent to which various alternative technologies will be adopted.

Fundamentally, regulators’ priorities are to improve outcomes for consumers and other gas users in both the short and longer terms. The importance and priority of decarbonisation does not remove the need to improve outcomes where and whilst natural gas is still being used.

In that knowledge, ACER and European Energy Regulators have sought to further the discussion on how to develop and manage the gas sector in the coming years and in the current context. Building on their respective consultations, ACER and CEER have prepared a joint ACER-CEER Conclusions Paper, outlining the regulatory community’s views on the key issues faced by the sector. The Paper is accompanied by the corresponding evaluations of the responses to both consultations. In addition, a formal ACER Recommendation sits alongside the joint Conclusions Paper, highlighting its proposals.

1.3 Intended users and use

The present Evaluation Report should be read in conjunction with the ACER Consultation paper, notably the consultation questions and the “proposed responses” presented throughout the document. This evaluation analysis is intended to respond to the views expressed by stakeholders during the consultation, and may also be of interest to EU or national actors with an interest in the natural gas sector and/or the strategy for the decarbonisation of our society.

1.4 Scope

The Evaluation Report focuses exclusively on the issues raised in the ACER Consultation Paper and the responses submitted by stakeholders. The analysis of these responses has been used to develop regulators' thinking and the preparation of the joint Conclusions Paper.

1.5 Approach and methods

The present evaluation report provides a summary of the views expressed by stakeholders in response to **4 broad consultation questions**, as presented in Table 1. It also provides ACER's views on these responses, including an indication of how ACER intends to address the various issues in the final joint ACER/CEER conclusions paper.

Table 1: Consultation questions from the ACER: Bridge beyond 2025

No.	Consultation questions
1.	<p>Is the proposed response set out above appropriate to address the challenges the sector faces? What should be done differently and why?</p> <p>In particular:</p> <p>1a. For monitoring the GTM metrics and prompting action, should the threshold values be set out at EU level? What should they be? Who should set these values?</p> <p>1b. Should there be new principles for tariff and allowed revenue methodologies in legislation – e.g. ensuring a level playing field between the gas and electricity sectors? What principles would be crucial?</p>
2.	<p>Should the Agency develop a joint Electricity and Gas Target Model in view of sector coupling and what key features should this model have?</p>
3.	<p>Is the proposed response set out above appropriate to address the challenges the sector faces? What should be done differently and why?</p> <p>In particular:</p> <p>3a. Who should provide data on the availability of decarbonised gases by location so as to enable assessment of changes of gas system needs and flows, in parallel to greater availability of decarbonised gases? At what frequency should this data be provided to the Agency?</p> <p>3c. Do TSOs face a conflict of interest in the future in planning gas and electricity infrastructure? If so, would stronger regulatory oversight resolve the problem? Which powers are needed and at which level (European, regional, national)? Would transparency requirements on TSOs/ENTSOs mitigate this problem and if yes, what shall be done?</p>
4.	<p>What powers are needed for dynamic regulation to be effective?</p>

Given the range of the issues presented in the consultation document, this **evaluation applies a thematic structure**, building on the proposed responses presented under the **2 overall topics** of the consultation document:

- Topic 1. Targeted regulation and market functioning
- Topic 2. Enabling new products and enhancing infrastructure governance

We recall here the “**proposed responses**” presented in the Bridge consultation document:

- 1) Market Monitoring as a basis for action
- 2) Liquidity on balancing platforms
- 3) Administrative and legal requirements

- 4) Oversight of regional entities and market areas
- 5) Transmission tariffs and cross-border capacity allocation
- 6) Institutional and governance arrangements
- 7) Defining new technologies
- 8) Dynamic regulation for new activities
- 9) Governance for infrastructure planning
- 10) Regulation of new networks
- 11) Other issues

We have grouped these **11 issues** into “themes”. This thematic approach ties together related issues and facilitates their analysis. Stakeholder responses took a number of different forms and structures, such that this thematic approach ensures that their substantive views are captured according to each of the issues raised in the consultation document.

The table below summarises the **5 thematic groups** and indicates which issues have been grouped under each, as well as the consultation questions to which they correspond.

In the evaluation tables that follow for each theme, we breakdown the stakeholder views for the respective issues, and indicate to which of the consultation questions these views respond.

Table 2: Thematic grouping of the issues in the Bridge consultation document

Thematic group	Corresponding proposed response	Corresponding consultation question
A. Access and market monitoring	1 + 2 + 3	Q1a
B. Governance of infrastructure and oversight of existing and new entities	4 + 6 + 9	Q2 Q3c
C. Dynamic regulation for new activities and technologies	7 + 8 + 10	Q3a Q4
D. Transmission tariffs and cross-border capacity allocation	5	Q1b
E. Others	11	--

1.6 Evaluation team composition

The evaluation of the responses to the public consultation was undertaken by a team of experts drawn from the national regulatory authorities and ACER staff, within the context of ACER’s Gas Working Group.

1.7 Timeline

The consultation period took place between 23 July 2019 and 9 September 2019.

2. PROCESS

In many cases, responses were provided in a broad manner in the form of “position papers”, which did not cover all the topics or questions subject to consultation, or covered topics beyond the scope of the consultation paper. Therefore, not all respondents provided input for all topics, and the categorisation of responses was not always straightforward, since in some instances judgement was required to conclude whether stakeholders provide full support, general support with nuances, or have other views on the gas Bridge ideas.

The position of stakeholders depends on the type of interest they may have on the topic. For example, infrastructure operators and their associations consider that the current

framework for planning infrastructure is adequate and that additional regulatory oversight is not required. On the other hand, NGOs and some industry associations perceive a conflict of interest of TSOs (one of their goals is to promote and maximise the value of network infrastructure), and believe that infrastructure operators are not always neutral facilitators promoting efficient network developments.

Therefore, throughout this Evaluation Report, where relevant, the summaries indicate the categories of stakeholders who share a common view on a given issue. For example, views shared by infrastructure operators, by industry, traders and companies, by public authorities or by NGOs, etc. (please see breakdown of respondent categories in Figure 1). Categories of stakeholders were usually more relevant to classify the responses than the number of responses advocating a certain view.

The evaluation tables below were prepared by applying the thematic grouping presented in Section 1.5. The respondents' views are summarised in the left-hand column, by theme. Taking into account the various perspectives presented, the right-hand column provides ACER views on the proposals and indicates how it intends to reflect these in its Conclusions Paper. All comments from the stakeholders were taken into consideration when analysing the present EoR, and the Agency took careful note of the proposed suggestions, including those which go beyond the scope of the consultation questions. With that in mind and for the purposes of The Bridge Beyond 2025, not all comments find a direct equivalence in the right analysis column. Further reflection on these comments will be incorporated into other ACER work in future.

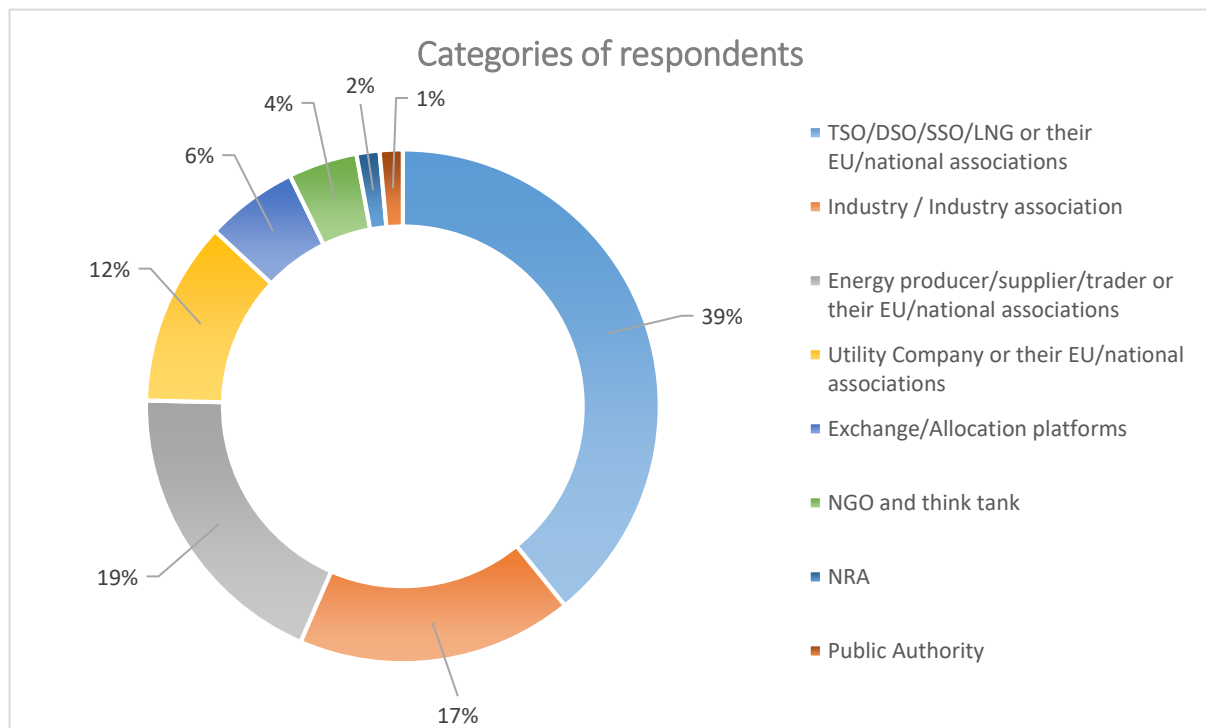
3. STAKEHOLDER ANSWERS

ACER received 69 responses from a range of stakeholders, one of which confidential. *Figure 1* summarises the main types of respondents. ACER notes that 75% of the responses were provided by:

- TSO and/or DSO and/or their national / European associations (39%)
- Industry and/or industry associations (17%)
- Energy producers and/or supplier and/or traders (19%).

The remaining 25% came from utility companies (12%), exchange and/or allocation platforms (6%), NGOs (4%) and energy NRAs and public authorities (3%).

Figure 1: Breakdown of categories of respondents



THEME A: ACCESS AND MARKET MONITORING

Covering the following issues:

- 1) Market Monitoring as a basis for action
- 2) Liquidity on balancing platforms
- 3) Administrative and legal requirements

CORRESPONDING CONSULTATION QUESTION: 1a

1. Is the proposed response set out above appropriate to address the challenges the sector faces? What should be done differently and why?

In particular:

- 1a. For monitoring the GTM metrics and prompting action, should the threshold values be set out at EU level? What should they be? Who should set these values?

Respondents' replies	ACER views
<h3>1) Market Monitoring as a basis for action</h3>	
<p>AGTM metrics and thresholds in EU law</p> <ul style="list-style-type: none"> • All respondents consider the Gas Target Model (GTM) metrics as a valid tool. • In response to the consultation question, almost all respondents support the inclusion of GTM metrics in an EU law, while a minority of respondents does not support the inclusion of GTM metrics in EU law (almost exclusively system operators). • Infrastructure operators propose not to set GTM thresholds at EU level, while vertically integrated utilities propose alternatives (e.g. by market size, by hub group, by level of diversification of gas sources, by hub liquidity, by demand components, by region). • A minority of respondents propose EU-level GTM thresholds, one of them asks to allow a transitory five-year period for the less liquid group of countries. • Several respondents state that some market distortions are not currently included in GTM metrics and that metrics should be amended to capture them, e.g. storage obligations in Poland, obligations in Romania, market merger proposal in Germany and consequent reduction of firm capacity. • Some respondents ask there should be no additional data/reporting obligations deriving from ACER's proposal and/or subject to cost benefit analyses. • Many respondents provided suggestions on the types of metrics that could be included, such as: 	<ul style="list-style-type: none"> • ACER notes stakeholders' general support for establishing a system to monitor and improve market functioning. • ACER welcomes the suggestions for metrics and thresholds which could be developed to support this analysis and reinforce the GTM-based approach. • Taking into account the feedback received, ACER believes that to improve market functioning and address emerging issues, a new system of dynamic and targeted regulation should be established in law, based on the Agency's market monitoring and NRA analysis and action. • That being said, in order to maintain flexibility to adjust metrics and thresholds over time and to decide on appropriate interventions at national or regional level, the legislation should only specify the process enabling the Agency to update them • ACER considers that alongside the GTM metrics, sustainability metrics are needed to give a fuller picture of the extent to which the sector is operating successfully. • ACER takes note of the further comments and suggestions regarding market distortion and other types of metrics for future consideration. • Regarding the regulatory toolkit, ACER appreciates the suggestions received, which are generally supportive of the use of

<ul style="list-style-type: none"> ○ Non-quantifiable market functioning aspects, e.g. ease of market entry, potential double reporting obligations; ○ Sustainability indicators (e.g. CO₂ emissions, methane emissions, biogas and other blue and green gases injected in the grid); ○ Electricity inputs (e.g. electric vehicles, electricity storage, hybrid boilers, power to gas); ○ Number of active shippers, availability of entry capacity, number of gas sources (LNG not to be considered as one single source); ○ Tariff levels on entries and exits, market concentration level, gas market liquidity, TSO allowed revenue level, funds accumulated on the regulatory account (where relevant), degree of implementation of EU Directives; ○ Distinguish between metrics measuring outputs (e.g. market concentration or liquidity) and those measuring inputs (e.g. implementation of NCs). <ul style="list-style-type: none"> ● One respondent asks to focus more on the need to promote free flow of hydrogen into the gas grid and for ACER to define an indicator for liquidity of hydrogen market, while another respondent called for reviewing completely all metrics in view of the long-term decarbonisation targets and the need to protect consumers. ● Some respondents ask that ACER works closely with market participants to promote reforms where market entry is likely and where market participants are actively seeking support from authorities. <p>Regulatory toolkit, targeted regulation, mergers</p> <ul style="list-style-type: none"> ● Almost all respondents support both the regulatory toolkit and the targeted regulation but have different views (depending on the category of respondent) on: the consequences of not meeting the GTM thresholds, the role of the toolkit and the role of ACER and NRAs in the process. ● Several stakeholders ask for market intervention only after implementation of all EU energy acquis (DIR, REG, NCs) or only if issues are outside NRA remit, e.g. taxes, business practices 	<p>targeted solutions to address market functioning issues.</p> <ul style="list-style-type: none"> ● ACER considers that such regulatory toolkit should be based on the tools described in the GTM such as various forms of market mergers, but should also comprise other tools, such as the introduction of a market maker function to improve liquidity, adaptations of the tariffs, or commodity or capacity release programmes. ACER appreciates the additional issues identified by stakeholders to be considered in the toolkit. ● In addition, ACER believes that NRA tasks and powers should be reinforced to empower them to fix issues when market functioning thresholds are not met. To this end, NRA action plans need to contain regulatory measures, which can be taken from a regulatory toolkit following a cost-benefit analysis (CBA). ● ACER should also be able to support these actions, in particular where cross-border issues arise and the concerned NRAs are not able to reach a joint decision.
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- Some respondents ask to apply ad hoc solution only if necessary and with CBA after assessment of impacts on adjacent markets and with analysis of measures to avoid distortion effects on the market
- One respondent does not support the regulatory toolkit and proposes to give to ACER and EC more EU-level decision-making and enforcement powers in case NRAs are unable to enforce the full and comprehensive implementation of framework guidelines (FGs) and network codes (NCs).
- System operators see no role for ACER in the regulatory toolkit and targeted regulation and ask to apply them on case-by-case basis by focussing on NC implementation, low carbon prices and energy transition. Also, they ask that the toolkit be based on non-exhaustive and non-binding measures and that mergers happen on a voluntary basis only.
- Some respondents support a review of ACER powers to monitor and actively support rules implementation in case of proven lack of progress
- Several respondents ask for EU rules on accessing and using gas infrastructures to remain untouched when applying targeted regulation
- Some stakeholders ask for additional elements to be included in the toolkit, e.g.:
 - Cross-sectoral coordinated security of supply (SOS) measures considering cross-commodity and cross-facility competition;
 - Negative effects on trading of high cross-border tariffs at an IP and NRAs cooperation to reduce tariffs
 - ACER to approve CBA on inter-TSO compensation (ITC) mechanism mergers if no NRA agreement;
 - CBA to consider the impact on neighbouring markets; removal of administrative and legal requirements representing major blocking issues that create disproportionate burden and hinder market access, (e.g. PL storage obligations, RO central market obligations, language barriers and limits to transparency, registration procedures of different nature, reporting obligations, and many others);
 - Clarify the definition of “standard firm and interruptible capacity products”

<p>in the CAM NC and give more transparency to evolution of technical capacity.</p> <ul style="list-style-type: none"> • One respondent suggests to apply EU Third Package rules also to third connected countries (e.g. CH) to ensure full integration. • One respondent asks that any new market measures do not create distortive effects on electricity and gas tariffs, with cascade effects on the short-term and long-term gas transportation capacity values. • One respondent asks that ACER plays the role of gatekeeper of sustainability. 	
<h2>2) Liquidity on balancing platforms</h2>	
<ul style="list-style-type: none"> • Several respondents propose firstly to implement fully the Third Package provisions, to define how to assess “insufficient liquidity” and to understand the reasons behind lack of it. • Some respondents state that the Gas Balancing (BAL) NC already allows TSOs to trade in adjacent balancing zones. • Some respondents ask to prioritise market maker measures to increase liquidity. • A minority of respondents ask for NRAs to be free to decide how to deal with the issue, after stakeholder involvement. • One respondent supports the measure after positive CBA. 	<ul style="list-style-type: none"> • ACER agrees that implementation of current provisions for balancing is a priority. Indeed, currently Member States can use balancing platforms to manage gas balancing until 2024. As this deadline approaches, market monitoring will inform whether sufficient liquidity is developing or interventions are needed. • ACER’s proposed system of dynamic and targeted regulation, based on strong market monitoring, will support this work. As stakeholders indicated in response to the consultation, this could include use of a market maker role.
<h2>3) Administrative and legal requirements</h2>	
<p>EU black-list</p> <ul style="list-style-type: none"> • Respondents across all categories support establishing an EU blacklist, some of them also support its extension to subsidiaries and board members. • One respondent asks to set also criteria for a company to be removed from the black list. • One respondent asks to publish list of active and de-activated users. • Some respondents state that a black list is only an ex-post measure, while ex-ante actions are more effective. • Some respondents state that it is necessary firstly to set filters by NRAs, TSOs and DSOs to prevent fraud. 	<ul style="list-style-type: none"> • ACER notes stakeholders’ support for establishing an EU-wide blacklist, as well as related criteria. In addition, ACER agrees that ex ante measures are also necessary. • ACER supports introducing a combination of sensible ex-ante and ex-post checks by the TSO (for registration) and/or the NRA/competent authorities (for licensing) and, where appropriate, proportionate requirements for collateral. In terms of ex ante measures, for example, TSOs could develop harmonised counterparty risk management policy at European level, set up a centralised EU database on creditworthiness and market behaviour accessible to TSOs, NRAs, ACER and

<p>Mutual recognition of licenses</p> <ul style="list-style-type: none"> • Several respondents support the mutual recognition of licenses, with differing approaches: <ul style="list-style-type: none"> ◦ Follow "best available practices" with financial conditions set by national TSO and MSs, avoid minimum common denominator (view mainly of system operators); ◦ Licensing can be a barrier, avoid imposing onerous collateral and other barriers to trade on importers and wholesale traders, keep these requirements only on suppliers; e.g. SOS measures, reporting obligations, diversification requirements (view of market participants). • One respondent does not support mutual license recognition before a certain level of harmonisation is reached. • Some respondents highlight that most trading barriers are not linked to license (e.g. PL storage obligations, RO obligations, DE market hub merger and limitations to firm capacity). <p>Storage, LNG and harmonisation of electricity and gas regulations</p> <ul style="list-style-type: none"> • Some respondents support the harmonisation of the electricity and gas frameworks and ask that gas storage sites are supported in various ways to avoid the negative consequences of their closure (gas system operators). • Some respondents do not support the proposal to create a common target model because sector coupling is at an initial stage and ask to carry out first a CBA analysis on how to harmonise frameworks (electricity system operators). • One gas TSO asks to avoid competition between electricity and gas sectors and that additional infrastructures could still be required in some regions. • One respondent asks to extend the provisions of Art. 18(9) of Reg. 2019/943 EC to the gas sector and to extend the level playing field to all technologies (electrolysers, power-to-heat, storage). • One system operator asks to reduce storage regulation while keeping unbundling provisions. 	<p>ENTSOG, in order to avoid that the cost of fraud and /or default are socialised.</p> <ul style="list-style-type: none"> • Taking into account the various views received, ACER believes that a system of mutual recognition (or an equivalent mechanism) for wholesale market licences should be introduced across the EU, whilst ensuring that they do not become a barrier to trade. • ACER underlines that requirements concern wholesale trading, not retail market supplier licenses. • Regarding the link between the electricity and gas regulations, ACER reiterates its view on the importance of a degree of alignment and sector coupling between the two sectors. In particular, ACER proposes to harmonise the electricity and gas regulatory frameworks only in areas where electricity and gas do or can compete, e.g. in energy storage. • ACER agrees that the regulatory framework should facilitate the integration of new gases into the market, whilst safeguarding the division between competitive and non-competitive activities by the various actors. • Regarding providing a level playing field for all technologies, ACER believes that network charges should provide a level playing field between gas and electricity – for example, between gas and electricity storage: electricity storage may currently be treated either as a generator (often exempt from network access charges) or as a consumer (subject to network access charges similar to those applied to end consumers), while for gas storage a discount may be applied on network access charges. Similar considerations may arise for power-to-gas facilities. In order to ensure a level playing field and promote economic efficiency, the tariffs applied to these assets should reflect the costs they impose on the network. • ACER takes note of the specific comments raised regarding storage and LNG regulation, which was beyond the scope of the consultation.
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| <ul style="list-style-type: none">• One gas TSO asks to avoid any LNG regulation.• One gas TSO asks to set up a supportive and flexible framework in order to include renewable and green gases in the grid and to allow commercial innovation for TSOs. | |
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THEME B: GOVERNANCE OF INFRASTRUCTURE AND OVERSIGHT OF EXISTING AND NEW ENTITIES

Covering the following issues:

- 4) Oversight of regional entities and market areas
- 6) Institutional and governance arrangements
- 9) Governance for infrastructure planning

CORRESPONDING CONSULTATION QUESTIONS: 2; 3C

- 2. Should the Agency develop a joint Electricity and Gas Target Model in view of sector coupling and what key features should this model have?
- 3c. Is the proposed response set out above appropriate to address the challenges the sector faces? What should be done differently and why?

In particular:

3c. Do TSOs face a conflict of interest in the future in planning gas and electricity infrastructure? If so, would stronger regulatory oversight resolve the problem? Which powers are needed and at which level (European, regional, national)? Would transparency requirements on TSOs/ENTSOs mitigate this problem and if yes, what shall be done?

Respondents' replies

ACER views

4) Oversight of regional entities and market areas

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| <ul style="list-style-type: none"> • Several respondents consider that the same degree of regulatory oversight should be applied to entities to whom a regulated task was delegated, while others consider the current level of oversight of regional entities is sufficient. • Other respondents are of the view that oversight of regional entities and market areas should be dealt with by lower-level legislation or regulation, or that flexibility should overpass rigid rules. | <ul style="list-style-type: none"> • ACER confirms its view that delegation of TSO legally required tasks should not weaken the level of regulatory oversight. |
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6) Institutional and governance arrangements

Joint Electricity and Gas Target Model

- Several stakeholders note that a joint electricity and gas Target Model would be difficult to implement. Other respondents find it premature or not desirable.
- Several respondents think that a Joint Target Model should possibly be developed by ACER or at least, the electricity and gas TMs should be built in coherence.

ACER powers over ENTSO budgets:

- ACER reiterates the importance of coordinated planning between electricity and gas, including by further developing joint scenarios and interlinked models for the purpose of infrastructure planning. On a broader scale, it notes the general support of stakeholders to develop and deepen sector coupling, including as regards competition and tariff issues, outlined under Theme D.
- To that end, ACER believes that the overall governance arrangements in gas should be brought into line with those recently updated

<ul style="list-style-type: none"> On ACER powers over ENTSO budgets, some stakeholders believe that ACER already has sufficient powers, whereas others consider that ACER should not be granted the power to approve ENTSOs' budgets. 	<p>for electricity in the Clean Energy Package (CEP).</p> <ul style="list-style-type: none"> While taking into account the critical response from many respondents (mostly TSOs) on empowering ACER to oversee the ENTSO budgets, ACER believes this is important given the increased importance of ENTSOs' tasks under EU legislation. Therefore, the regulatory oversight over the detailed budget and work programme of ENTSOs should be enhanced to ensure they count with adequate means to perform their obligations. Therefore, the possibility for ACER to request an amendment, if it deems the budget to be insufficient to cover the ENTSO's legal obligations, as well as if it considers the budget to be too generous, is deemed as reasonable and proportionate. Coordination with NRA oversight of national TSO budgets should be foreseen.
<h2>9) Governance for infrastructure planning</h2>	
<p>TYNDP governance</p> <ul style="list-style-type: none"> Responses show mixed views depending on the type of organisation. On one hand, NGOs, public authorities and some industry associations advocate for more regulatory oversight by ACER and NRAs, given that TSOs may face a conflict of interest, and are not a neutral facilitator promoting efficiency. On the other hand, TSOs and some industry associations are of the view that the current framework is fine. They deem that TYNDP is not "central planning", and that additional powers for ACER are not justified and would risk delaying processes. Some respondents add that investments in gas assets should be done only after a very careful analysis, also to avoid the risk of stranded assets. Several respondents note that infrastructure planning should be addressed mainly at national level, and that the subsidiarity principle should be respected. Other respondents believe that investments in gas infrastructure should only be made after strong analysis and should not be incentivised. <p>Scenarios for infrastructure planning</p> <ul style="list-style-type: none"> Responses show again mixed views. NGOs, public authorities and some industry 	<ul style="list-style-type: none"> ACER reiterates the need to ensure coherence across multiple sectors and consistency between the EU and national level. This can be ensured by establishing at EU level a consistent set of definitions, criteria, and scenarios for TYNDP use. Furthermore, ACER considers it should be given the power to approve the ENTSOs' scenario development, needs identification and TYNDPs and to require amendments by the relevant ENTSO, with due justification, when the plan is deemed non-compliant with the objectives in the relevant regulation. This approval would not overwrite the approval of national development plans. ACER reaffirms its view that future gas projects should be assessed against an improved CBA, in order to address decarbonisation and sustainability aspects, as well as transparency and replicability.

associations are in favour of greater ACER oversight, while TSOs deem that ACER approval is not justified, would alter the balance of powers and may cause delays. Some stakeholders stress the need for coherent and coordinated electricity and gas scenarios at EU and national level.

- Several stakeholders call for a joint electricity and gas TYNDP to be developed, or at least with enforced cooperation/coordination and with a common framework.

CBA methodology

- Responses show mixed views. NGOs, public authorities and some industry associations advocate for more regulatory oversight and powers to ACER and NRAs. Most stakeholders call for enhanced transparency and replicability. Some stakeholders recall the importance of ensuring that a project has a positive and robust CBA to avoid stranded assets. Conversely, TSOs find the current governance process adequate.
- Stakeholders also note that the CBA methodology should be standardised and oriented to assess cross-border benefits of new “national” infrastructures on neighbouring markets.

Methane emissions

- Five respondents addressed this issue. In general, these respondents underline the importance of continuing to monitor leaks of carbonised gases and minimise the risk of leaks to the extent possible.
- A utility company favours the reinforcement of the constraints on gas system operators to track methane emissions.
- Meanwhile, an NGO supports the establishment of the suggested European Methane Emissions Observatory, recommends creating a multi-stakeholder collaborative platform and sees a need to expand ACER and NRA mandates over this entity.
- System operators emphasise that methane emissions management and reduction are a top priority for the European gas industry and refer to a [2019 GIE-Marcogaz report](#) on “*Potential ways the gas industry can contribute to the reduction of methane emissions*”. Action plans must be defined,
- Methane emissions do not fully fall within the scope of NRA responsibilities (since they are not responsible for setting technical standards for gas network operation). Nonetheless, several regulatory provisions could contribute to the reduction of methane emissions:
 - Strict definition of decarbonised / renewable gases, taking into account the whole value chain from production to consumption (if there are greenhouse gas emissions at any stage, the gas should not be considered fully renewable / decarbonised);
 - Tariff incentives can effectively encourage infrastructure operators to limit emissions.
- The issue of carbon accounting (in a broad sense, including other greenhouse gases



implemented and extended over all parts of the natural gas value chain. If a European Methane Emissions Observatory is created, it should be based on the National Inventory Reports, with the advantage that they cover the methane emissions from all the emitting sectors.

- A system operator states that monitoring of methane emissions must remain a responsibility of Member States as it is now, under the EU's GHG monitoring mechanism, which sets the EU's own internal reporting rules on the basis of internationally agreed obligations.

such as methane) is important but very technical. Even if it does not fall directly within the scope of NRA tasks, ACER considers TSOs, storage operators and LNG operators, as well as Distribution System Operators (DSOs) above a size threshold, should be obliged to measure and report their methane emissions according to a standard methodology. The data should be publicly available through a European Methane Emissions Observatory. The measurements should be followed by an action plan at system operator level to address emissions. NRAs should recognise the efficiently incurred costs of emission reduction for regulated entities.

THEME C: DYNAMIC REGULATION FOR NEW ACTIVITIES AND TECHNOLOGIES

Covering the following issues:

- 7) Defining new technologies
- 8) Dynamic regulation for new activities
- 10) Regulation of new networks

CORRESPONDING CONSULTATION QUESTIONS: 3a; 4

3a. Is the proposed response set out above appropriate to address the challenges the sector faces? What should be done differently and why?

In particular:

3a. Who should provide data on the availability of decarbonised gases by location so as to enable assessment of changes of gas system needs and flows, in parallel to greater availability of decarbonised gases? At what frequency should this data be provided to the Agency?

4. What powers are needed for dynamic regulation to be effective?

Respondents' replies	ACER views
<h3>7) Defining new technologies</h3>	
<ul style="list-style-type: none"> • There is broad support for the proposed approach to adopt definitions and criteria to clearly determine the different types of green and decarbonised gases, as well as for “conversion”. Respondents note that without common definitions and criteria, a coherent regulatory framework is not possible. • Several stakeholders proposed a distinction between “renewable gas” (defined according to the recast Renewables Directive 2018/2001 (REDII) emission and sustainability criteria) and “decarbonised gas” and highlighted the need to identify the missing elements of various decarbonised energy products (i.e. gases not covered by the definitions in Article 2(1) and (35) of RED II). • Several stakeholders state that a harmonised system of guarantees of origin (GOs) at EU level should be put in place. 	<ul style="list-style-type: none"> • ACER welcomes the broad support by respondents and will retain the views expressed in the consultation document. • ACER especially stresses the need for a European-wide definition of decarbonised gases not covered by RED II, as this should avoid market fragmentation by allowing that also GOs for decarbonised gases can be traded across borders, while being strict enough to effectively contribute to the transition to a decarbonised economy. • Indeed, further consideration is needed for decarbonised gases more generally and to ensure that a consistent approach is adopted. • ACER welcomes the work on classification of gases developed by the Florence School of Regulation following discussions at the 32nd Madrid Forum.
<h3>8) Dynamic regulation for new activities</h3>	
<p>Definition of dynamic regulation</p> <ul style="list-style-type: none"> • The proposed dynamic regulatory approach is broadly supported by stakeholders. 	<ul style="list-style-type: none"> • In ACER's view, dynamic regulation should comprise the adoption of consistent principles at European level, while leaving the necessary flexibility in adjusting general rules to national and local circumstances as well as a regulatory approach that is

- However, respondents reflected upon different concepts of 'dynamic regulation' in their responses:
 - Most respondents (incl. TSOs, DSOs, suppliers and producers) interpret dynamic regulation such that EU regulations should define principles and should leave space for MSs to make decisions on a matter, in order to provide them flexibility in adjusting general rules to national and local circumstances.
 - Several respondents (mainly network operators) consider that regulation should be adaptive over time (e.g. regulatory sandboxes).

Involvement of network operators

- Regarding the involvement of network operators in new activities, e.g. power to gas (P2G), two groups of respondents could be identified.
- One group of respondents (mainly network operators) stated that network operators should be allowed/could play a key role in the development of new technologies, under regulatory oversight. In particular:
 - Some infrastructure operators (mostly gas TSOs) argue for rules allowing active involvement of TSO/DSO to support the scaling up of new technologies. Several market players consider that the general rule should be that TSO activities should remain limited to regulated activities and that exceptions should be duly justified. Respondents who argued for TSO/DSO involvement in P2G facilities underline that regulated third party access (TPA) to such P2G facilities (conversion service from renewable electricity to renewable gas) would have to be granted in any case.
- The other group of respondents emphasised that network operators should not be allowed/should not play a key role in the development of new technologies, except as a last resort, i.e. where there is no interest of the market (suppliers, consumers).
- Some respondents also mentioned that if network operators are involved in developing such new activities, ENTSOs should not be drafting network codes (NCs).

adaptive over time, in line with market developments.

- ACER agrees that sandboxes are an appropriate tool to allow pilot projects time-limited derogations with a view to generate information that is useful in the public interest and providing that there is no significant risk of a material impact on the wider market. Limitations in scope could be seen in relation to the overall size of the gas market (e.g. as long as gas volumes from power-to-gas plants are insignificant compared to the overall size of the gas market) or electricity flexibility market (e.g. as long as the capacity of power-to-gas plants is insignificant compared to the capacity of the overall electricity flexibility market). In some Member States, legal frameworks allowing exemptions for "regulatory sandboxes" have already been introduced. An "EU umbrella" should be established to enable such sandboxes across all Member States in a consistent way.
- As regards the involvement of gas TSOs/DSOs in the development of new technologies and activities, a parallel can be drawn with the approach for electricity storage/electric vehicle recharging points adopted in the CEP. This could be formulated as a confirmation of how the existing approach to unbundling applies to new activities.
- The legal framework should define a set of conditions under which involvement may be allowed. Where the market is not already bringing forth needed investment, the next course of action could be to utilise competitive tenders. If this fails, then following careful analysis of the cost and benefits of the proposed investment and of the effect on competition, it may be possible to grant limited exemptions to TSOs and DSOs to allow them to invest in order to get the market started.
- Regarding the question of whether the market is sufficiently developed to provide the activity, an open, transparent and non-discriminatory tendering procedure should be carried out as a first step. The activity should be necessary for the TSO/DSO to fulfil their legal obligations for the efficient, reliable and secure operation of the transmission system. In order to reflect the

<ul style="list-style-type: none"> Some respondents stated that P2G should not be considered as a production activity, and/or should not face the same grid charges and taxes. <p>Data:</p> <ul style="list-style-type: none"> Regarding data on the availability of decarbonised gases by location, the majority of respondents (infrastructure operators, suppliers, traders) were of the view that this data should be collected from either TSOs/DSOs or GO issuing bodies. However, some respondents noted that they see no need for any additional data reporting requirements at this time. <p>EU-DSO entity</p> <ul style="list-style-type: none"> Several respondents expressed support for the creation of an EU-wide gas DSO entity, and noted that DSOs have a central/key role to play in sector coupling. However, one respondent believes that an EU DSO would not be able to capture different regional circumstances. 	<p>need to further integrate the gas and electricity systems, TSOs/DSOs should also take into account the secure and efficient operation of the interconnected (electricity-gas) system when carrying out their tasks. In an integrated energy system, this should apply both to gas and electricity TSOs/DSOs.</p> <ul style="list-style-type: none"> Additional restrictions could be considered such as requiring investment to be made through a separate but related company for greater transparency, and potentially outside the scope of the regulated regime (without revenue guarantee). Requirements to divest once the market is ready to take over could also be relevant. Care would need to be taken not to allow TSO/DSO-operated assets to foreclose the market for the services these assets provide, to use their inside information to secure the best sites or to cross-subsidise the new projects putting the TSO/DSO in an unduly favourable position while creating detrimental effects on existing markets (e.g. flexibility market). As regards the treatment of P2G, ACER believes that a technology-neutral, level playing field should be established between different conversion and storage facilities across the energy sector, so that they face equivalent categories of costs in network tariffs and levies, and equivalent recognition of environmental and security of supply benefits. ACER welcomes the proposal made by the majority of respondents to consider the role of TSO/DSO and/or GO issuing bodies to deliver data on the availability of decarbonised gases by location. ACER considers it useful to bring gas DSOs into a European DSO entity, with clearly defined tasks and objectives, in order to ensure that future possibilities and limitations of DSO networks are taken into account to support new technologies and to ensure the DSOs' views are part of the EU deliberations when developing new measures.
<p>10) Regulation of new networks</p>	
<p>Hydrogen network</p> <ul style="list-style-type: none"> Nearly one third of the respondents (including industry, TSOs, suppliers/traders, 	<ul style="list-style-type: none"> ACER notes that most respondents that addressed this topic share similar views regarding the necessity to regulate dedicated hydrogen networks when these networks become mature and widespread.

associations) addressed the issue of a hydrogen network.

- Technologically neutral regulation is broadly supported. In particular:
- Most respondents agreed that when dedicated hydrogen networks are developed, they would best be regulated in a similar way to existing natural gas networks, with exceptions for private networks (e.g. a situation in which hydrogen is piped to a single industrial user). At the very least, TPA should be ensured.
- Some respondents noted that it is premature to decide if and how hydrogen networks should be regulated and referred to 'dynamic regulation' as an option to deal with hydrogen.
- Some respondents mentioned that detailed regulation of hydrogen network should be avoided at the early stage to allow the market to develop.
- Several respondents addressed the blending of hydrogen into the gas network. They encourage the use of existing gas networks to be upgraded to accept a maximum amount of hydrogen, rather than creating costly parallel hydrogen networks. It is suggested to extend the existing Gas Directive and Regulation to apply beyond natural gas to include other gases and hydrogen.

TEN-E Regulation

- Most respondents support that new technologies (e.g. P2G) should be eligible for inclusion in the TYNDP and possibly the Projects of Common Interest (PCI) list.

- ACER will retain its view expressed in the consultation document. In addition, ACER notes that further thinking is needed as to how, from a regulatory perspective, a possible transition to dedicated hydrogen networks (connecting diverse supply and demand of hydrogen) might be facilitated or at least not hindered.
- ACER agrees with some respondents that it might be premature to decide and implement the regulation for hydrogen right now. However, establishing general European principles, such as third party access, as to how the market design and regulation for hydrogen will evolve when dedicated hydrogen networks are developed, will mitigate possible uncertainties over future regulation which in itself could hamper (and delay) initial investments in decarbonised gases like (green and blue) hydrogen.
- ACER notes the views raised by some respondents concerning the blending of hydrogen into the gas network. This is now reflected in Chapter 5 of Conclusions paper. ACER favours a European approach to investigate the development of a common threshold for blending hydrogen in gas networks to ensure the flow of gas and cross-border trade and to provide a clear framework for equipment providers and consumers of fuel. Firstly, a revision of the CEN provisions on gas quality could be considered and in the long run also a revision of network codes (Interoperability) could be the right framework for this.
- On the amendment of the TEN-E Regulation, ACER considers it could be amended in order to include investments promoting decarbonisation in the TYNDP and possibly as PCI, where this would facilitate increased efficiency in supporting the energy transition in the best interests of energy consumers.

THEME D: TRANSMISSION TARIFFS AND CROSS-BORDER CAPACITY ALLOCATION

Covering the following issues:

- 5) Transmission tariffs and cross-border capacity allocation

CORRESPONDING CONSULTATION QUESTIONS: 1b

1. Is the proposed response set out above appropriate to address the challenges the sector faces? What should be done differently and why?

In particular:

- 1b. Should there be new principles for tariff and allowed revenue methodologies in legislation – e.g. ensuring a level playing field between the gas and electricity sectors? What principles would be crucial?

Respondents' replies

ACER views

5) Transmission tariffs and cross-border capacity allocation

Transmission tariffs

- The responses showed a general agreement with the proposals of the ACER public consultation document.
- Regarding possible issues with the current tariff design, a large group of respondents, composed of TSOs, utilities, traders and energy exchanges, confirmed that the present tariff design does not appear to be causing major issues at a pan-EU basis, although they may arise (or are already arising) at regional level (for example, in cases of high cross-border tariffs that create problems for trade or due to differing implementation of the Gas Tariffs Network Code (TAR NC) at national level). These respondents consider it important to complete the ongoing implementation of the TAR NC and to monitor its application.
- Several stakeholders highlighted that the principles of cost-reflectivity and non-discrimination, already established in the TAR NC, should be applied (including to cross-border tariffs).
- Some respondents presented their reservations on the proposal of shifting cross-border tariff to external borders.
- Some stakeholders, mainly composed of industry, traders and utility companies, highlighted that the implementation of the current framework is already creating

- ACER appreciates the general agreement among most of stakeholders with the proposals of the consultation document.
- ACER agrees on the importance of completing the implementation of the TAR NC in all Member States, as well as monitoring its effects on the gas market in order to assess whether adjustments may be required and before considering wide-ranging changes.
- To address problems which may emerge within the tariff system, ACER believes there are a range of possible measures that could be taken at a regional level, as presented in the Consultation Paper. A possible response could be to allow the reserve price in cross-border capacity allocation to be reduced, on the basis of an agreement between the concerned NRAs, supported by ACER in a mediating role where needed.
- ACER agrees that any solution (including mergers) should be based on a cost-benefit analysis (CBA), taking into account the impact on the whole gas system.
- In case NRAs decide to implement an ITC, and in order to foster its implementation, ACER consider clear principles are needed, along with an appropriate institutional framework setting out the roles and responsibilities of each entity. ACER believes that the establishment of clear

<p>problems or may do so in the future, and there is evidence that cross-border charges are becoming a hindrance to trade at least in some regions, notably in peripheral countries. Moreover, several stakeholders reported that problems are also arising from the differing national implementation of the TAR NC. In case of disagreements among NRAs, they highlighted that ACER should have an active role.</p> <ul style="list-style-type: none"> • When problems at regional level arise, stakeholders generally agree that NRAs should apply regional solutions, such as merging zones and/or allowing the reserve price in cross-border capacity allocation to be reduced. • One respondent supports mergers, but only after assessment of effects on neighbouring markets and with no effect of limiting firm capacity to and from neighbouring markets. Many stakeholders highlighted that solutions (that generally need an ITC mechanism) should be based and decided upon following a CBA, taking into account the impact on the other gas markets, and they should be cost-reflective. • Some respondents ask to prioritise pilot projects for selling capacity through innovative mechanisms at specific IPs and/or market coupling instead, to avoid making significant changes to current rules. • One respondent favours using ITC over full market mergers. • Additionally, several respondents asked for modifications to the tariffication system, like reducing charges at IPs and transferring cross-border tariffs to either exit or domestic points. Other respondents advocated for more harmonisation of the national tariff methodologies and/or a new methodology that better allocates the costs to domestic and non-domestic customers. • Specifically on the implementation of ITC mechanisms, multiple categories of respondents, (utility companies, TSOs, energy traders and suppliers) stated that it needs to be based on a CBA. In case of disagreement between the involved NRAs, some respondents agree on empowering ACER to tackle it. Other concrete proposals or suggestions were also presented, such as: 	<p>guidelines at EU level could help implement such mechanisms when needed.</p>
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<ul style="list-style-type: none"> ○ More guidance in legislation on cross-border ITC mechanisms; ○ Implementation of ITC that specifically takes into account the network topology and network-specific actual costs; ○ Introduction of an ITC mechanism between electricity and gas; ○ Regional mergers of entry-exit zones should be conducted on a voluntary basis, and based on a consultation with relevant stakeholders. ○ Creation of larger market areas to simplify cross-border trading and strengthen the functioning of the gas market. <ul style="list-style-type: none"> ● Regarding the entry-exit system, some respondents, namely utility companies and TSOs, also called for a definition of an entry-exit system at EU level. However, some industry associations expressed uncertainty on the need to introduce entry-exit systems on the application of different capacity products. ● Respondents presented various considerations on the need for more definition and limitation of entry-exit zones: relating to very different issues, like capacity calculation and limitations to the free allocability of capacity or balancing provisions. ● Some stakeholders commented on the issue of harmonising methodologies for the calculation of allowed revenues of TSOs. A first group of stakeholders, composed mostly of TSOs, stated there is no need for more harmonisation and/or are in favour of leaving the responsibility of defining TSO remunerations at national level. A second group, namely industry and utility companies, asks for more harmonisation and transparency on the calculations of the allowed revenues. One stakeholder also asked for more harmonisation of revenues also between electricity and gas TSOs. <p>Sector coupling</p> <ul style="list-style-type: none"> ● When discussing sector coupling, there was general agreement on ensuring a level playing field and technology neutral approach, taking into consideration the different technological aspects of the two sectors. This statement was defended by 	<ul style="list-style-type: none"> ● ACER notes the considerations identified by stakeholders regarding more definition and limitations, and considers that they deserve distinct and more in depth debate. That being said, ACER considers that the definition of the entry-exit system and of harmonised capacity products (firm, interruptible and conditional) in the context of an entry-exit system is currently lacking and needs to be accurately developed, taking into account the topology of the network, flow patterns and the potential for physical congestion. ● Regarding allowed revenues, ACER notes that the way in which TSOs assets are valued and their allowed revenues calculated has an impact on the tariff levels, thus indirectly on the possibilities for cross-border trade and market integration. With that in mind, there is further room for improvement in order for cross-border tariffs properly to allocate the costs of the network used by domestic and non-domestic flows. Furthermore, the allowed revenue of the TSO is part of the equation for calculating the cross-border entry-exit prices. In order fully to address the issue in those circumstances where an ITC mechanism is in use, ACER believes that the calculation of a TSO's allowed revenue to be considered in the ITC mechanism should be assessed against a set of common criteria. The guidance would be applied by the NRAs to derive specific parameters for the ITC mechanism in a comparable way. ● Regarding sector coupling, respondents showed their alignment with the ACER
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many types of respondents such as industry associations, TSOs, energy traders and suppliers. There were also concrete suggestions, such as:

- Setting up a framework for EU harmonised certificates and standards for green gasses;
- Requiring identification and improvement of the relevant interfaces between electricity and gas system;
- Exempting P2G devices from final special taxes and levies, and designing tariffs at EU level to avoid discrimination of green gas;
- Defining an integrated tariff structure of the energy grids and setting incentives to avoid non-economical grid developments;
- Setting up revenue supporting schemes, contracts for difference or other mechanisms such as feed-in-tariffs, to bridge the gap between conventional and renewable/low-carbon solutions in order to enable the take-off of renewable and low-carbon hydrogen.

Long-term capacity allocation

- On the rules to prevent longer-term capacity (LTC) bookings, some respondents, mainly industry associations, expressed their uncertainty on the need for such a limitation. Instead of ending such contracts, it is proposed to reduce cross-border tariffs based on NRA agreements or through a regional merger approach. One utility company highlighted the risks of a “spiralling effect” on tariffs considering the expiry of LTCs in the current tariff regulatory framework.

proposal by broadly supporting consistent principles between electricity and gas, while taking into consideration the different technological aspects of the two sectors, in order to ensure a level playing field and a technology neutral approach. In particular, a rigorous competition analysis will be necessary to determine the status of P2G facilities, whether they should be considered as electricity flexibility tools or as gas producers, once their business model is mature.

- The same categories of costs should be charged to competing facilities. Economic efficiency also requires avoiding levies on storage and conversion technologies, although tax policy is not within ACER’s competence. NRAs should be tasked with reviewing the substitutability of gas and electricity assets and ensuring that network charges provide a level playing field between gas and electricity.

- ACER notes stakeholder calls for better application of existing long-term contracts (rather than limiting them). ACER maintains its view on the need to monitor and publish occurrences of unfair practices, as well as to consider additional tools for NRAs to be able to block assignments to a single player where this could constitute abuse of a dominant position. On this issue, ACER considers that additional measures of intervention should be elaborated as part of targeted regulation to allow for urgent response to possible risk of market foreclosure.

THEME E: OTHER ISSUES

Covering the following issues:

11) Other issues

CORRESPONDING CONSULTATION QUESTIONS: N/A

Respondents' replies

ACER views

11) Other issues

Decarbonisation and environmental integrity of gas

- A small group of respondents noted that ACER is too optimistic about the future role of gas and request that ACER and other energy institutions focus more on decarbonisation and sustainability by introducing the following measures:
 - CBA methodology to include carbon dioxide impacts;
 - Gas quality definition to include emission impacts on an equal footing with safety;
 - Gas infrastructure operators to be subject to fees if they do not meet minimum requirements for leak detection (even if no immediate risk for safety) and repair activities (LDAR, same as for safety risks);
 - Environmental merit order in tariff design and capacity allocation/transport curves to be introduced based on both cost and climate impact so that gas produced with environmental integrity, from operators that take adequate measures to reduce both CO₂ and methane emissions through timely repair and prevention of leaks, has priority;
 - Add efficiency incentive at system level through energy prices that signal the scarcity of the resource and reflect environmental damages, including GHG emissions, along the supply chain, including outside the EU;
 - Gas produced with environmental integrity should not serve as an

- ACER notes that many concern issues of relevance to policy-makers and the wider EU energy policy debate on delivering decarbonisation, rather than classical energy regulation.
- Most of the proposals refer to governance and infrastructure investments. These should be further analysed and discussed.
- ACER agrees that CBAs should be adapted in order to include decarbonisation and sustainability elements with proper regulatory oversight. As noted in Theme B, ACER should be given the power to prescribe binding guidelines for the CBA methodology, require ENTSOs to amend the methodology and require ENTSOs to document any models used in the CBA in a way that allows third parties to run the analysis independently.



excuse to grow additional, purpose-driven crops to increase the supply of gas, or as an excuse to build additional infrastructure to facilitate transportation.	
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ANNEX I: LIST OF RESPONDENTS

No.	Organisation	Segment	Country of origin	Confidential
1.	AGGM	Gas	AT	NO
2.	AMBER GRID	Gas	LT	NO
3.	ANIGAS	Gas	IT	NO
4.	BDEW	Gas, Electricity	DE	NO
5.	CAN EUROPE	Other	LV	NO
6.	CEDEC	Gas, Electricity	EU	NO
7.	CGA	Gas	CZ	NO
8.	CONFINDUSTRIA	Other	IT	NO
9.	DEPA	Gas	GR	NO
10.	DIHK	Other	DE	NO
11.	E3G	Other	SE	NO
12.	EDF	Gas, Electricity	FR	NO
13.	EDF ENVIRONMENTAL DEFENSE FUND	Other	UK	NO
14.	EDISON	Gas, Electricity	IT	NO
15.	EER	Gas, Electricity	EU	NO
16.	EFET	Gas, Electricity	EU	NO
17.	ENAGAS	Gas, Electricity	ES	NO
18.	ENEL	Gas, Electricity	IT	NO
19.	ENERGINET	Gas, Electricity	DK	NO

No.	Organisation	Segment	Country of origin	Confidential
20.	ENERGY COMMUNITY	Gas, Electricity	EU	NO
21.	ENGIE	Gas, Electricity	FR	NO
22.	ENI	Gas, Electricity, Oil	IT	NO
23.	ENSTOG	Gas	EU	NO
24.	ERVIA	Gas	IE	NO
25.	EURELECTRIC	Electricity	EU	NO
26.	EUROCHAMBRES	Other	EU	NO
27.	EUROGAS	Gas	EU	NO
28.	EUROPEX	Gas, Electricity	EU	NO
29.	EUSTREAM	Gas	SK	NO
30.	FLUXYS	Gas	BE	NO
31.	FNB GAS	Gas	DE	NO
32.	GASUNIE	Gas	DE	NO
33.	GAZPROM EXPORT	Gas	RU	NO
34.	GAZPROM GERMANIA	Gas, Electricity	DE	NO
35.	GAZSYSTEM	Gas	PL	NO
36.	GCA	Gas	AT	NO
37.	GD4S	Gas	EU	NO
38.	GEODE	Gas, Electricity	EU	NO
39.	GIE	Gas	EU	NO

No.	Organisation	Segment	Country of origin	Confidential
40.	GNI	Gas	UK	NO
41.	GRTgaz	Gas	FR	NO
42.	HYDRO	Other	NO	NO
43.	HYDROGEN EUROPE	Gas	EU	NO
44.	Iberdrola	Gas, Electricity	ES	NO
45.	IFIEC	Gas	EU	NO
46.	INES	Gas	DE	NO
47.	IOGP	Oil and gas	EU	NO
48.	LIQUID GAS EUROPE	Hydrogen/ Oxygen	EU	NO
49.	MIBGAS	Gas	ES	NO
50.	NATIONAL GRID	Gas	UK	NO
51.	NATURGY	Gas, Electricity	ES	NO
52.	OMV	Gas, Electricity	AT	NO
53.	PGNIG	Gas	PL	NO
54.	PLINOVODI	Gas	SL	NO
55.	POWERNEXT	Electricity	FR	NO
56.	PRISMA	Gas	DE	NO
57.	RTE	Electricity	FR	NO
58.	SEAS-NVE	Gas, Electricity	DK	NO
59.	SNAM	Gas	IT	NO



No.	Organisation	Segment	Country of origin	Confidential
60.	STORENGY UK	Gas	UK	NO
61.	TENNET	Electricity	NL	NO
62.	TEREGA	Gas	FR	NO
63.	TERNA	Electricity	IT	NO
64.	UPRIGAZ	Gas	FR	NO
65.	URSO	Gas, Electricity	SK	NO
66.	VATTENFALL	Gas, Electricity	SE	NO
67.	WNDEUROPE	Electricity	EU	NO
68.	WKO	Gas, Electricity	AT	NO