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## **FNB Gas e.V. – Response to ACER’s Public Consultation on European Energy Regulation: A Bridge to 2025**

FNB Gas e.V. – the association of gas transmission system operators in Germany – appreciates the opportunity to respond to ACER’s consultation “European Energy Regulation: A Bridge to 2025”.

Similar to other European transmission system operators (TSOs), German TSOs operate in a dynamic market framework regarding the ongoing development and implementation of various network codes. With their work i.e. on the PRISMA European Capacity Platform (PRISMA) as well as with their commitment to the cooperative work within ENTSOG, German TSOs prove to be highly dedicated to ensure that the European gas market continues to evolve in the future. However, German TSOs believe that such ongoing work should be allowed to unfold the intended effects before new and additional regulatory actions are taken. German TSOs hence share the view of ENTSOG (cf. ENTSOG response to this public consultation) that any new regulation or revision of regulation should be based on thorough evaluation of such intended effects of the network codes especially in order to ensure stability and reliability of the regulatory framework.

Since German TSOs consider gas being the backup for renewables and the most relevant storage option via power to gas as well, such a stable and reliable regulatory framework is key for future investments in the backbone for the implementation of the energy turnaround.

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German TSOs in this regard again agree with ENTSOG's view that investors require a robust environment especially including support for investments by longer term user commitments and an adequate risk-reward ratio (rf. to ENTSOG response to this public consultation).

German TSOs would also like to refer to the response being given by all shareholders of PRISMA (including German TSOs) regarding ACER's intention "to assess the appropriate level of regulatory oversight for [...] capacity allocation platforms". Since PRISMA is considered to be a technical instrument in order to comply with regulation on the basis of a voluntary early implementation by already regulated TSOs, regulatory oversight of PRISMA itself (as well as of similar entities) and, thus, additional regulatory action does not seem to be appropriate especially because the (positive) effects of such entities on the European gas market cannot have taken full effect at the time being.

German TSOs will continue to engage in the evolvement of the European gas markets and the "Bridge to 2025" discussion.

Sincerely Yours



Inga Posch  
Managing Director



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