MINUTES

Network Code on Harmonised Transmission Tariff Structures for Gas

ENTSOG Stakeholder Joint Working Session 4

26 March 2014 from 10:00 – to 17:00

At ENTSO-E Conference Centre, Av. de Cortenbergh 100, Brussels

Company	Name	Company	Name
ENTSOG (chair)	Ann-Marie Colbert	Fluxys	Raphaelle Ciuch Pilette
ENTSOG	Jan Ingwersen	GASCADE	Rolf Wagner
ENTSOG	Áine Spillane	GasTerra	Arco Hofman
ENTSOG	Violeta Bescós Roy	Gastransport Nord GmbH	Jann Keller
ENTSOG	Panos Panousos	Gasunie Deutschland	Ksenia Berezina
ACER	Thomas Querrioux	Gazprom M & T	Alex Barnes
ACER	Lewis Hodgart	GDF Suez	Claude Mangin
ACM	Kirsten Bowens	GDF Suez	Pierre Glasson
BNetzA	Stefan K	GDF Suez Infrastructures	Sylvie Denoble-Mayer
BNetzA	Meike Schoenemeyer	GIE	Philipp Daniel Palada
BNetzA	Rafael Gralla	GRTgaz	Fabrice Desjardin
Centrica Storage Ltd	Roddy Monroe	GRTgaz Germany	Jean Dubard
CRE	François Leveille	ExxonMobil / OGP	Kees Bouwens
CREG	Tom Maes	IFIEC Europe	Valentin Hoehn
DEPA	Theodoros Mantoukas	National Grid	Colin Hamilton
DG Energy	Tanja Held	Net4Gas	Borek Kubatzky
EDF	Nabil Mezlef	ONTRAS	Niels Krap
EFET	Colin Lyle	Reganosa	Laurent Moriceau
Enagas	Paloma Izquierdo Fernández	RWE Supply & Trading	Stephen Rose
Enagas GTS SAU	Miguel Martitegui	GTS	Bas Barten
Europol Gaz S.A.	Dominika Bronner	Snam	Alessandro Gussetti

Statoil	Davide Rubini	TIGF	Emmanuel Bouquillion
Shell	Amrik Bal	Vattenfall	Helga Norrby
TAQA	Robert Jan Maaskant		

ENTSOG also provided a webcast facility for those unable to attend in person.

1. OPENING

> Welcome / Introduction; Process Update

Ms Ann-Marie Colbert welcomed the participants to the 4th TAR NC SJWS. The objectives of SJWS 4 were indicated to be as follows: to discuss the Business Rules on: (i) Multipliers & Seasonal Factors, (ii) Cost Allocation (Business rules part 2) (iii) CAM Related Topics (iv) General Provisions and (v) Transparency. In addition to this it was outlined that Net4Gas would present their Asset Allocation Approach methodology. Stakeholders were encouraged to provide inputs and suggestions for the discussions and it was mentioned that written feedback on the business rules is important to help ENTSOG to develop the draft NC.

2. MULTIPLIERS & SEASONAL FACTORS

2.1. Overview

Mr. Fabrice Desjardin presented an overview of the business rules on Multipliers & Seasonal Factors. In addition, an example of the impact of the multipliers proposed in the FG was presented in order to ascertain the possible impact of these multipliers on a shipper's capacity booking strategy. To illustrate and quantify this impact, two different scenarios were been taken into consideration, that consisted of comparing the revenue coming from the sale of capacity with the revenue obtained if only daily capacity had been bought. Scenario 1 – where the reserve prices for each product are constant through the year (m=1) and scenario 2 – where the reserve prices for winter products are higher (1.5) than those for summer products (0.5) (m=1 & SFs). Both of the scenarios presented, outlined how multipliers more than 1 would be needed in order to minimise cross subsidisation between different users and to ensure the recovery of allowed revenue.

2.2. Stakeholders' views

Mr. Claude Mangin presented Eurogas' views at this stage of the process. Multipliers & Seasonal factors must be higher than 1 in order to avoid both discrimination against those network users already locked into long term capacity contracts and cross-subsidisation between different categories of shippers and consequently to massive under-recovery. Eurogas agrees that seasonal factors should be calculated based on system usage, i.e. flow or bookings, but should not be calculated each year based on the previous years flow or bookings. Seasonal factors should be based on "normal" winter condition or average on several years in order to avoid volatility from one year to the other. Seasonal factors should be fixed for several years to be able to arbitrate between long term and short capacity products. The need to recalculate seasonal factors each year was also questioned.

2.3. Discussion

Q: With multipliers there will be less capacity booked, but that's the meaning of optimisation, so if we optimise (our bookings) because of multipliers, de facto, there will be less capacity booked.

A: I totally agree; the objective is not to sell products that people don't need and use. We need optimisation. The cap of 1.5 could be appropriate in some cases but not in others. It's a condition that will shift from long term to short term bookings, some sippers will benefit, but others won't, as the reference price will increase. We are not against multipliers, but think the upper limit of 1.5 may not be appropriate in all cases.

A: There will be trade-offs if you change the rules, some will lose and some will win. It is not just about trying to avoid massive cross-subsidisation; it is also about creating prices that will allow optimisation of gas between the markets.

Q: It is not the TSOs decision to decide that all shippers should be treated equally, isn't that the responsibility of the NRA?

A: Yes I agree, we are against discrimination, which is why we are against the cap of 1.5 as it leads to discrimination.

Q: I'm concerned with the obsession with short-term capacity. The achievement of the internal market is jeopardised. If we have this framework, then the TSO will not invest and this is exactly against the objective of the Commission and European Union. I agree they have to be challenged and maybe the Framework Guidelines is not going in the right way for that.

A: ACER – we acknowledge that (the cap of 1.5) may shift cost from one user to another. In the majority of countries the multipliers are currently under the 1.5 cap and we need to remember that in CAM Network Code there is a minimum of 10% of the capacity which is dedicated to short-term bookings. This capacity has to be economically and realistically priced. If not, we will not optimise use of the network. We can't put a price on this cap that would mean it would never be used. We need to find a balance and 1.5 is a balanced compromise.

Q: If you (ACER) say you need visibility of seasonal factors, why do you want precise rules in the Network Code? If there is a big problem, it will take time to revise, so why are we not more open?

A: I agree that there should be a balance between short term and long term capacity but am not convinced that a cap of 5 is required. There have been no sufficient argumentations as to what the higher number should be.

A: The slides presented showed 2 extreme cases, as an example to show that there should be a balance.

A: The issue is, if there are high multipliers, then it may not represent the correct price to bring gas across that interconnector point, so it may be priced at a higher price but it will not get sold at all.

Q: Once the prices of multipliers are set, how long do they remain valid for? Is it one year?

A: Our understanding is that any tariffs remain valid for the tariff setting period, so in some circumstances it is one year and in others it may be more than one year.

Q: Would you know the price of all the products 30 days before the CAM auction or just the annual product?

A: No you wouldn't. The framework guideline sets out that the tariffs will be published at least 30 days in advance of the tariff year. For example, if the tariff year commenced on 1st January, you would know the tariff by 1st December etc.

Q: How are you planning on recovering the loss of revenues expected (with the multipliers being set at < 1.5? Will you just raise the reserve price at that specific point? Do you think it will raise the pressure on the entry/exit split?

A: Currently unsure – whatever the case, we are neutral due to the allowed revenue. Whatever happens, we will apply the chosen Cost Allocation Methodology and it will depend on the outcome of the Cost Allocation Test also. The most important element is to ensure that there are no cross subsidisations.

Q: ACER – understands the issue (of potential under recovery) and realise that (the cap of 1.5) will not always work, but would need to see very clear evidence of this and what the clear impact would be.

A: Every set of multipliers will work for the TSO, but the question is, will the multipliers be fair or do we want simplicity. If we go for simplicity, then this will inevitably lead to cross subsidisation between customer types.

Q: In a Price Cap regime we you don't have a revenue recovery mechanism, how would these caps work? (With regard to under recovery of revenue) The risk for the TSO is knowingly being increased, so do we increase the price on a case by case basis?

A: You would use interim measures to slowly converge the multipliers, i.e. a reasonable modification of multipliers and therefore the risk isn't that much.

The following points were also discussed

- Shippers may favour short term bookings, but if there aren't any long term bookings then TSOs won't get any signals to invest – there appears to be a contradiction between this discussion on multipliers and the incremental capacity debate.

- If you fix the conditions for multipliers, you do not optimise well, so the simpler you can make this, the better – we need a sustainable system for the future.
- Benchmarking would definitely not have anything to do with the market value of the short term capacity. The value of the short-term market is set by commodity market and therefore looking at the price differences between markets for the period for which you are buying the capacity.
- It was acknowledged by ACER that there was no scientific analysis as to why a cap of 1.5 was proposed, it should be stressed that it is very important to find a balance especially considering the views being expressed by the stakeholders around the room.
- The importance of the definition of congestion (as per CMP) and the importance of considering whether there is physical congestion or congestion due to 'hoarding' of capacity was highlighted especially related to its use for setting multipliers.
- It was also expressed that if the issue of congestion is being used as an indicator of how much capacity is booked and therefore having lower multipliers, then there is less risk of revenue under-recovery.
- It was suggested by a stakeholder that if the capacity is fully booked, then you don't need a reserve price as there will be no capacity to be sold, and therefore it could be kept simple. If there is loads of capacity available, then you may be justified in having high multipliers but need to be careful not to price new entrants out of the market.

3. COST ALLOCATION

3.1. Overview

Mr. Niels Krap provided an overview of the business rules on Cost Allocation (part 2) and the presentation primarily focussed on Secondary Adjustments namely Equalisation, Rescaling and Benchmarking. It was highlighted that the NC on tariffs shall only allow equalisation for security of supply, price stability and fostering competition in the retail market and/or in the renewable energy sector and an example was provided to highlight how equalisation may be applied. In addition to this, two alternative approaches to rescaling were presented, and an example of how benchmarking could work as a secondary adjustment. It was highlighted that benchmarking should be limited to the cases where TSOs face effective competition from other TSO's points or route and that the reasoning for decision shall be provided by the NRA. In addition, the NRAs shall cooperate with each other to ensure a consistent and compatible approach and the benchmarking proposal shall be consulted upon.

3.2. Discussion

Q: With regard to benchmarking, why do you not reduce the price even further in order to create real competition?

A: The Framework Guideline states that NRAs shall co-operate with each other with regards to benchmarking.

Q: You say that you expect that an increase in bookings would offset the fact that you have reduced the price at a particular point due to benchmarking but if not, what would you do? Would you smear this on the other points?

A: Yes, it would be possible to do that.

Q: Would a long term solution not be to merge the zones and put the cost on the exit – that would be the economical solution

A: A merger is much more complicated in reality that what was presented.

3.3. Asset Allocation Approach

Mr. Borek Kubatsky presented an overview of an Asset Allocation approach as a cost allocation methodology on behalf of Net4Gas to provide information to stakeholders. In addition to reminding stakeholders of the Objectives of Cost Allocation Methodologies used for Tariff Calculation (in line with Art. 13 of Regulation (EC) 715/2009), Mr. Kubatsky also outlined the principles and general approach of the Asset Allocation approach, i.e. (i) identification of homogenous groups of network users, (2) identification of assets necessary to provide peak demand capacity to each identified group of network users at associated entry/exit points, (iii) calculation of costs for each identified group of network users and (iv) distribution of costs to identified entry/exit points.

An in-depth example of the Asset Allocation approach was provided as were the perceived benefits, e.g. a transparent and simple calculation, clear input parameters, methodology reflecting actual system characteristics and minimising approximations, possibility to allocate costs to different groups of points / network users and to perform reconciliation avoiding unwanted cross-subsidies between different groups of points / network users and enabling a clear and transparent cross-border cost allocation mechanism.

Some aspects deemed not to be covered by some other approaches were also presented, namely, (i) based on actual system characteristics reducing approximations to an absolute minimum, (ii) possibility to perform reconciliation clearly and transparently avoiding cross-subsidies between different groups of points / network users (iii) transparent ex-ante choice of degree of cost socialisation through definition of groups of points / network users, (iv) possibility to clearly distinguish costs associated with infrastructure accommodating domestic capacity needs and costs associated with infrastructure accommodating transit capacity needs and (v) differentiation of costs for which reimbursement of costs is guaranteed and costs for which reimbursement of costs is not guaranteed with possibility to reflect different risk levels for associated parts of the system.

3.4. Discussion

Q: If you have a shared asset between cross-border and domestic, how do you split the costs between the 2?

A: You identify the capacity needs for domestic and transit (i.e. the flow scenarios and maximum capacity needs) then you get a fixed capacity ratio and use this ratio for the split of the assets.

Q: Would you be able to agree flow scenarios with neighbouring countries so that they too could implement asset allocation approach in a consistent way?

A: This would be up to the TSOs and involved NRAs but in systems that were very similar, I assume this would be possible.

Q: How do you take bi-directional flows into account when you are agreeing flow patterns?

A: You can take into account flows in both directions in order to get the ratio. It is based on assumptions which are based on consultations with the network users.

Q: What is the difference between this approach and the Matrix approach?

A: As I understand it, the matrix approach is based on certain identified routes for gas flows but does not distinguish directly between the assets used for domestic capacity demand and for transit demand. It tries to allocate the costs to the points but then tries to equalise the resulting outcome of all the tariffs which is then from our (Net4Gas') point of view, making it unclear and does not enable us to perform the cross border allocation in the defined form using our method. This is the most substantial difference. You can also do a reconciliation in a much clearer way.

Q: Are you saying that if a TSO uses other Cost Allocation Methodologies, that he cannot allocate costs cross-border as foreseen in the 3rd package?

A: I'm not saying it is impossible, I'm saying that it's more complicated because of the kind of costs are you identifying in order to have (from the other side of the border) a revenue/payment guarantee and because we are not looking at one time payments, we are looking at a much more systematical approach.

The following points were also discussed

- ACER believes the proposed Asset Allocation approach is very similar to the Portuguese model and suggested that Net4Gas discuss this with the Portuguese TSO and/or NRA. ACER is also currently of the opinion that their approach is not incompatible with the Framework Guidelines but are not sure that there is a need for a 5th Cost Allocation methodology.
- There was a general discussion primarily between Net4Gas and EC/ACER on the merits of this approach and with regards to ring-fencing and cross-subsidies.
- There was a clarification from SNAM regarding the Matrix approach whereby it was clarified that equalisation is not carried out ex-post but as part of the methodology. SNAM also suggested that it may be possible for Net4Gas to use the matrix approach and felt that they would arrive at similar tariffs.

4. CAM RELATED TOPICS – BUSINESS RULES

4.1. Overview

Mr. Colin Hamilton provided an overview of the business rules on CAM Related Topics, namely for Bundled Products, VIPs and Payable Price. The main points to note were, for **Bundled Capacity** products, the components of the price for bundled capacity, the split of revenue from bundled capacity products: from reserve price and from auction premium and that there should be agreement between the NRAs (IP between MSs) and decision of 1 NRA (IP within 1 MS).

For **VIPs** the main points to note were: the VIP tariff is equal to the price at one side of the border while the VIP tariff for bundled capacity is equal to the price at one side of the border plus the price at the other side of the border. The price at one side of the border: (1) situation with 1 TSO; (2) situation with more than 1 TSO. For the situation with one TSO: (1) cost allocation methodology allows 'merging' physical IPs; (2) cost allocation methodology does not allow merging physical IPs and for the situation with more than 1 TSO: necessity of an additional calculation

For **Payable Price**, the main items highlighted were: the components of the payable price, i.e. the reserve price plus auction premium, the options for the payable price at IPs which could be fixed, floating or a combination. The option for 'fixed' could be a fixed reserve price, adjusted only by inflation (defined in the real terms). The option for 'floating' would be the reserve price (applicable tariff) when the capacity is used and the option for 'combination' could be e.g. bundled product (fixed price at one side of the border and floating price at the other side of the border).

4.2. Stakeholder Views

Mr. Claude Mangin presented Eurogas' views at this stage of the process on Payable Price. Floating price should not be an issue for shippers if there are no massive under or over-recoveries since the reference price would then be quite stable. Some alternative options were presented such as having a fixed reserve price in exchange for a premium for both new and existing contracts. The premium would be considered as the cost of having this guarantee of a fixed price. There could also be the possibility to use the auction premium to absorb some of a floating tariff increase at the time of use of the capacity. These should not lead to cross-subsidies between network users, if they are applied appropriately. The risk of the reconciliation of the regulatory account on a smaller customer based is balanced by the fact that shippers who have subscribed to the fixed tariff have paid a premium in exchange for the certainty of the tariff and this additional cost should be of the same magnitude as the variation of the reference price. Shippers must know, in advance of the long term auctions, if these options would be available or not.

4.3. Discussion

There was a long and open discussion between stakeholders and ACER on the merits of fixed versus floating price. It was highlighted by ENTSOG that when we talk about fixed, this may include a fixed charge but with a variable charge attached also. ACER reiterated that 'floating' is their preferred decision, as in their opinion, if you only have 'fixed' then you have some clear cross-subsidisation problems. Those on a fixed charge would not be exposed to the variants in allowed revenues – this is the principle problem they foresee with fixed price.

ACER stated that they are not saying that no other option (other than floating) would work, but that as with everything else, there are trade-offs and we need to find some sort of balance as there will be winners and losers. ACER believes that harmonisation is beneficial and that a clear, consistent approach is needed for the payable price.

Stakeholders felt that the only users being disadvantaged if there is a floating price are those who book capacity for more than one year and they will have to pick up the under-recovery in the next year(s), regardless of whether the under-recovery was as a result of their actions or others. There are a number of ways to tackle this problem and the advantages and disadvantages of all options should have been clearly laid out and discussed.

ACER highlighted that careful consideration had gone into their final decision but that if any new evidence is submitted to the contrary they could take this into account.

Q: Could you not choose a different method for solving the problem of under-recovery due to fixed price, e.g. put the under-recovery on the exit?

A: No – we would need to be fair to all consumers.

Q: ACER also stated that it is relevant to consider how compatible different approaches would be with the bundled capacity requirements as you need to have clarity, simplicity and harmonisation.

A: Stakeholders felt this was not a problem as it is already complex as you would have two separate contracts with two TSOs and so long as one know what the charges were for each product (in each contract) then all you had to do was add the two charges together.

Q: There doesn't appear to be sufficient evidence to show why a mix of fixed and floating cannot work in a fair way. Couldn't a variable charge be used in conjunction with the fixed tariff?

A: A commodity charge will simply mean a shift of the cost from those with a low load factor profile to those with a high load factor profile. Also, I don't see how the option of a fixed premium to pay the guarantee of fixed payable price would work in a revenue cap regime.

5. GENERAL PROVISIONS – BUSINESS RULES

5.1. Overview

Ms. Ann-Marie Colbert presented a general overview of the General Provisions – Business Rules namely on Implementation, Mitigating Measures, Tariff Setting Year IA and Monitoring.

For implementation, ENTSOG believes that the implementation of the TAR NC shall take place by the 1st of October 2017 or 18 months from the date of entering into force of the network code, whichever is later. ENTSOG has included three mitigating measure as options in the business rules which are additional to those put forward in the TAR FG. These options were previously presented to stakeholders in TAR NC SJWS 2. The section of the business rules on the tariff setting year sets out the three options for consideration as part of the impact assessment and questions will be included in the draft TAR NC consultation document to assess the impact of potentially harmonising the tariff setting year. ENTSOG believes that the monitoring of the network code implementation should be dealt with in a separate document rather than explicitly in the TAR NC. This topic is being discussed between ACER and ENTSOG, and it is hoped that a common understanding will be reached by mid-2014.

5.2. Stakeholder Views

Mr. Claude Mangin presented Eurogas' views at this stage of the process on Mitigating Measures and Tariff Setting Year Impact Assessment.

In terms of mitigating measures, the smoothing of the price increases over the tariff period only really delays the price increase. Stakeholders would prefer to have other one-off options such as the possibility for a shipper to terminate capacity contracts when the TAR NC enters into force or the possibility to shift entry point revenues to exit points. For the harmonisation of the tariff setting year, the most important thing for shippers is that they should know the multipliers and seasonal factors in advance of the start of the long term auction and the annual reference price for the whole gas year (as well as having reasonably predictable tariffs for the following years). A shipper needs this information so that he can decide what to book, i.e. whether he books an annual product for the next year or if he should profile his booking by buying quarterly, monthly and/or daily products.

5.3. Discussion

Q: With regard to the publication of prices before the auctions, is ACER able to tell us whether or not we can change the Network Code in this regard?

A: From an NRA point of view, the more information that is made available before the auction the better, however this is an issue more for the TSOs to agree to sign onto as they face the challenge of matching expected revenues with allowed revenues.

A: The whole point of the auctions is to judge willingness to pay and therefore it is an abdication from the NRAS to say it is a TSO decision, they should be saying that the TSOs must publish tariffs in advance of the auctions.

Q: With regard to mitigating measures, if you are suggesting that we push the under-recovery from the Entry point to the Exit point, then are you also saying that it would be ok to terminate my contract at the Exit point due to this large shift in the price? You are just shifting the problem from one point to another. Is this really a way to solve the under-recovery?

A: I would question how you would deal with termination clauses within the Network Code. At a national level there often exists contract law and there would be a potential overlap between the two.

Q: Would a mitigating measure possibly mean the delay of the implementation of the Network Code e.g. for 2 years due to being in the middle of a revenue setting period?

A: Yes, you can delay the effect of the Network Code at one or more points.

The following points were also discussed

- If you first publish tariffs in February (i.e. before the start of the auction in March) then the volatility of price increases/decreases will be far higher due to less accurate information being available for setting the tariff.
- If the prices are not published in advance of the yearly and quarterly products and are only known in advance of the monthly auctions, then the month ahead auction will perhaps become the key auctions going forward and therefore the Tariff Setting Year will not be an important element at all.
- A stakeholder view was expressed it is pretty much a red line that they need to know the price of the capacity before the auction and that it is up to both the NRAs and TSOs to make sure that it is published, and as a minimum at least for the 1st year of the auction, if you want the auction to mean anything at all.
- It was also highlighted that the issue of stepping out of contracts was not put into the Business Rules as it was not clear how this would work in practice and would create instability in the industry.
- The reality is that some countries have very unstable flow patterns and that the publication of tariffs 6 months earlier may lead to unrealistic tariffs. This fact was accepted by stakeholders who still maintained they need to know the price in advance of the auctions.

6. TRANSPARENCY – BUSINESS RULES

6.1. Overview

Ms. Raphaëlle Ciuch Pilette provided an overview on Transparency Business Rules on behalf of ENTSOG and outlined the evolution of ENTSOG's view of Transparency from SJWS 2 to SJWS 4. ENTSOG is working on creating customised templates for the cost allocation methodologies and in the presentation highlighted the list of inputs adjusted to the level necessary to run the methodology for each methodology. It was also outlined that it is necessary to preserve the confidentiality of commercially sensitive information when publishing these inputs.

6.2. Stakeholder Views

Mr. Claude Mangin presented Eurogas' views at this stage of the process on Transparency. The main points outlined were that it is mainly a reliability issue and it is still difficult to trust data and/or to understand what is happening at the system level, e.g. is the point congested or not and that ENTSOG should continue its good work with its transparency platform.

6.3. Discussion

Q: How do you propose to deal with the publication of confidential information?

A: That is already a standing issue – there are rules already in place for that so what we are talking about here is respecting those rules.

Q: If you have a number of end users that are situated close together, could you aggregate them and publish one tariff? Otherwise we wouldn't have transparency.

A: If we do that, we may end up aggregating points for transparency reasons only.

Q: From a stakeholders perspective it was recently requested that we would have a working model published alongside the input data into it. This would potentially allow us to predict how tariffs may change and would be efficient and fully transparent.

A: The Framework Guidelines specifies that TSOs will be obliged to publish certain information and what ENTSOG is doing is working on customising templates that will accommodate the publication of this data.

Q: Does the confidentiality principle create exceptions or are you trying to circumvent that?

A: We are trying to assess where the commercially sensitive information would come into it, based on the rules that are in place already.

> Information about the topics to be discussed at TAR NC SJWS 5

Ann-Marie Colbert indicated the topics to be discussed at SJWS 5: (i) Revenue Reconciliation Business Rules (ii) ACER Presentation on IIA/Justification Document (iii) ENTSOG Presentation on process, next steps and draft TAR NC and (iv) Stakeholders Views on process and upcoming draft TAR NC

> **Closing Remarks**

Ann-Marie Colbert thanked the participants for their contribution to the discussions. The draft slides for the next SJWS will be uploaded onto ENTSOG's website a couple of days before the meeting. The participants were invited to register for TAR NC SJWS 5.

* * *

Next TAR NC stakeholder meeting (SJWS 5): **09 April 2014** at the **Diamant Centre, Brussels**

ALL DOCUMENTS RELATING TO THIS MEETING CAN BE FOUND ON THE ENTSOG WEBSITE AT http://www.entsog.eu/events/tariff