

# **ENTSOG 5<sup>th</sup> Transparency Workshop**

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## Overall position on transparency

- Transparency is crucial to promote a level playing field and efficient functioning of the gas market
- Excellent information provision on transmission infrastructure operations is essential for system users to manage their portfolios in the most cost effective way and meet their customers needs.
- System users need TSO information provision to be
  - timely (including near real time where appropriate)
  - sufficiently detailed
  - provided in a user friendly manner (e.g. clear location, downloadable for quantitative analysis, English option etc.)
  - coherent and consistent, including with adjacent gas system data

## Current Transparency Guidelines largely meet users' **current** needs

- Eurogas jointly with other stake holders called for the improvements in minimum transparency at the 2008 Madrid Forum, largely incorporated into the revision of Chapter 3 of Annex 1 (EC) 715/2009 (Transparency Guidelines)
- Eurogas welcomed the revised Transparency Guidelines and called for effective and timely implementation by TSOs.
- The development of EU Codes and other binding EU Guidelines may lead to **additional transparency requirements**.
- Where necessary, these should be added to the Transparency Guidelines or incorporated in the relevant Code/Guideline to ensure users have the necessary data in time for operation under any new rules.

## TSO implementation of transparency guidelines



- With a focus on NW Europe, Eurogas generally observes a high level of implementation by TSOs.
- Eurogas welcomes the work done by TSOs in upgrading their online information provision to meet the 2011 requirements.
- Still some scope for better implementation:
  - flow data inconsistencies between adjacent TSOs, users need to understand reasons for differences
  - also for inconsistencies between real-time and daily flows
  - flow data and relevant CV values should be linked and downloadable together
  - TSOs should set out measurement methodologies (volume & energy), in case these explain differences in data between adjacent TSOs
  - daily demand forecasts seem to be missing for some TSOs
  - some TSO websites are easier for shippers to access and create scripts for automatic downloads than others

## TSO implementation of transparency guidelines (2)

- User thoughts on areas for enhancement, for further discussion\*:
  - not required by Guidelines, but a high-level breakdown of demand e.g. aggregate power stations, aggregate distribution off take, could help users respond to market needs.
  - more data on blending station use/flows, which can impact cross-border flows
  - explanation of exemptions to justify remaining non-publication of data at certain entry/exit points.
  - real-time flow data should be stored for historic download to allow new entrants equal access to past data, currently some TSO data is deleted after a few days

\* To be tabled in Eurogas System Users Committee, and further discussions sought with ENTSOG

## ENTSOG Transparency Platform

- A useful information tool for stakeholders.
- Eurogas is pleased with the steady improvement of the platform in response to users' needs.
- Benefit of aggregated information on system specifications and network access rules, combined with links to relevant TSO web pages.
- BUT
- Not all TSOs and points available.
- Helpful to users to highlight excluded TSOs/points rather than users having to find out omissions by searching
- Company traders/analysts prefer direct download from TSO websites
- Some links to TSO web pages are broken or only lead to TSO home page

Thank you for your attention.  
For further information please visit:  
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