

**Comments of the Romanian National Natural Gas Regulatory Authority (ANRGN)
concerning *Guidelines of Good Practice for Open Season Procedures***

The Romanian National Natural Gas Regulatory Authority (ANRGN) views the *Guidelines of Good Practice for Open Season Procedures* as a useful document, that promotes the development of competition on the natural gas market and leads to a higher level of transparency with regard to capacity allocation in the natural gas sector.

After analyzing the above-mentioned document, we appreciate that some clarifications are needed with regard to:

- The amount of minimum capacity this regulation applies to (for each type of infrastructure) or, alternatively, leaving to each regulator's latitude the setting of this amount. In our opinion, this amount should be significant so that, for small infrastructures, the capacity is allocated without any additional constraints.
- Who can have the quality of "sponsor" for the financing of infrastructure, taking into consideration the fact that national legislation sets clearly defined obligations for system operators with regard to developing the systems, as well as exclusive rights for capacity trading on the primary market.