



Gas Regional Initiative – Region South-South East

Gas Regional Initiative - Region: South-South East

An Action Plan for the South-South East Europe Natural Gas Market

Consultation Summary

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1. Introduction

1.1 ERGEG Gas Regional Initiative

More than two years after the second Gas Directive, the European Commission DG TREN Benchmarking Report¹ and DG Competition's preliminary report on its energy sector inquiry² found that the European gas market still suffers from lack of liquidity, low customer switching rates, and low price convergence. Despite the fact that nearly 60 % of natural gas that is used in the EU crosses at least one national border, markets are still mostly national in scope and hardly integrated. Remarkable discrepancies have emerged in the implementation of the Directive between Member countries.

Against this background the Energy Regulatory Group for Electricity and Gas (ERGEG) "Roadmap for a competitive single gas market in Europe"³ proposed creating a Gas Regional Initiative (GRI), made up of a small number of regional energy market projects (REMs), to push forward the development of competition at a practical level.

The final goal of the GRI is the development of liquid trading at, and between, gas hubs as the basis upon which regional markets will develop, and their eventual integration and convergence into a single European market. Enhanced cooperation between a limited number of participants, as it happens on a regional basis, would ensure a higher degree of collaboration than can be found at an EU-wide level, and help removing obstacles to the development of a more liquid market.

1.2 The South-South East Gas Market: A preliminary assessment

ERGEG has defined the REM "South-South East" (SSE), comprising Austria, the Czech Republic, Greece, Hungary, Italy, Poland, Slovakia, and Slovenia. Their combined gas market (Table 1) amounts to ca. 142 Bcm in 2005, about a quarter of the whole EU, with an average per capita consumption of 990 m³/year, slightly below the European average.

¹ European Commission, Directorate-General for Energy and Transport (DG TREN), Report on progress in creating the internal gas and electricity market, http://ec.europa.eu/energy/electricity/report_2005/doc/2005_report_en.pdf.

² European Commission (Competition DG – Energy, Water), Energy Sector Inquiry Draft Preliminary Report, published 16 Feb 2006, http://europa.eu.int/comm/competition/antitrust/others/sector_inquiries/energy/#16022006.

³ Published on 28 March 2005.

The market may be regarded as mature in most countries, with the exception of Greece, where gas was introduced in the energy mix ten years ago and the market has only recently been liberalised, and partly of Poland; however demand is still growing in the whole region, notably in the power generation sector.

This region is extremely important for its transit contribution: nearly half of gas used in the EU is transported through the countries of the SSE. Currently most such flows originate in the former Soviet Union, but SSE is also expected to become a major transit area for gas coming from Central Asia, the Middle East and Northern Africa.

This REM includes countries that have important common features (Table 1): notably a limited self sufficiency (14% on average), mirrored by high dependence on imports and particularly on the largest supplier: Russia alone accounts for 46% of all gas used in SSE. Lately, such dependency has also raised security of supply concerns.

The gas transportation network of the region is centred on the strongest European pipeline system (Brotherhood) entering Slovakia from the Ukraine, with a primary junction in Slovakia and further splits in Austria (Baumgarten) and in the Czech Republic. The Southernmost branch reaches Italy while parallel lines cross Hungary and Slovenia. From SSE gas of mostly Russian origin transits into Germany and France and into the Balkans.

This is a large and powerful interconnected system, featuring some spare capacity in the Slovak and Czech sections but with bottlenecks in Austria that generate congestion affecting Southern Austria, Slovenia and Italy.

At the outskirts of the regions different cases occur. On the North, Poland hosts in turn a large westbound transit system and is only poorly directly connected with Czech and Slovak Republics, however it shares the main features of the SSE market and would be interested in more effective interconnection with the rest of SSE for competitive and supply security reasons, to which is already connected through eastern Germany.

On the South East, Greece is currently interconnected only with Bulgaria, while an interconnection with Turkey (and hence with Middle Eastern and Caspian suppliers) is under construction and is expected to be completed by the end of 2006. A new interconnection with Southern Italy (and hence the rest of the EU) is in the planning phase and is expected to be completed by 2011. Greece also has an LNG terminal (currently under expansion) with significant spare capacity.

It is worth recalling that the Energy Community Treaty was signed on October 2005, between the European Community and eight South East European countries, aiming at establishing the Energy Community in SEE. Five SSE countries have a specific role in this

Treaty, which enters into force in July or August 2006. Such countries are expected to host a new pipeline system known as “The Fourth Corridor”, which has pan-European relevance as a potential source of new and diverse natural gas supplies.

On the South West, Italy is the largest SSE National market, is connected with Algerian and Libyan gas fields through the Transmed, with France and Germany through Switzerland and has an LNG terminal, and more under construction. Despite its potential to become a bridge for African gas bound for the rest of Europe it has been affected lately by capacity and gas shortages.

SSE countries currently include two “hubs”. A physical hub at Baumgarten, conveniently located at or near major pipeline interconnections and storage facilities; and the Italian notional hub, a “virtual exchange point” (PSV). However, almost 16 active traders at Baumgarten trade ca.. 500 Mcm per month. Little liquidity (compared to NW European hubs) is available on the Italian hub, currently consisting of the PSV and border points, which lately averaged ca. 870 Mcm/month, of which ca. 220 at the PSV.

Table 1 – Main gas market indicators (2005)

	Gas consumption per capita	Market size (bcm)	% of gas from domestic production	% of gas from largest foreign source	% controlled by largest company
Austria	1109,8	9,1	20%	59%	75%
Greece	243,4	2,7	0%	75%	100%
Hungary	1470,0	14,8	19%	70%	95%
Italy	1482,6	85,1	13%	32%	68%
Slovenia	547,0	1,1	0%	57%	100%
Slovakia	1206,6	6,5	3%	97%	100%
Poland	345,5	13,2	31%	46%	100%
Czech Republic	935,6	9,6	1%	71%	100%
South-South East	990,2	142,1	14%	46%	79%

Source: DG TREN Benchmarking Report 2005 and National Regulators

A quick look at the current market structure and regulation helps explaining such lack of liquidity. First, SSE countries display high market concentration: 79% on average is controlled by each country’s dominant companies, with several countries still almost under mo-

nopoly. Such dominant companies have a limited interest in liquid markets and trading at hubs.

On the other hand, SSE is a clear example of the regulatory differences hampering competition development in neighboring countries: for example unbundling of TSOs ranges from the minimum allowed solution - legal unbundling without assets, where the TSO does not even own the main assets it runs - to cases where ownership unbundling is about to be introduced.

TPA regulation was recently introduced or revised in all countries but it is highly differentiated in almost all main chapters (tariffs, capacity allocation, congestion management, balancing), as it appears at a glance from Table 2. Further differences may of course appear in a more detailed analysis. It is not surprising that even a shipper endowed with upstream gas, who needs crossing two or three countries to reach his customers, faces an uphill task to define carriage contracts across the different systems. Contract duration, tariff systems may change along his route, service specifications including balancing provisions may not match, even gas quality requirements may be a problem.

However, the high import dependency may also be related with a lack of upstream gas, so that even the removal of all service inconsistencies may not lead to a significant liquidity increase.

A correct understanding of the difficulties requires an in-depth analysis of the current situation, which starts from DG TREN's Benchmarking Report and DG COMP's Preliminary Report, but needs more details.

In order to correctly understand the issues SSE national regulators are currently undertaking a data collection process, parallel to consultation, following a commonly agreed questionnaire. The information collection and elaboration will be repeated in the following years in order to detect the evolution of the main issues.

Table 2 – Main regulatory provisions (as of 31 December 2005)

	Declared market opening (%)	Transmission tariff structure	Capacity booking procedure	Unbundling of TSO	Regulator powers with regard to transport tariff
Austria	100%	post/distance	flexible	legal	ex-ante
Greece	70%	post-stamp	first come first served	legal (by end 2006)	ex-ante
Hungary	69%	entry-exit	auction	ownership	ex-ante
Italy	100%	entry-exit	flexible	legal	ex-ante
Slovenia	90%	post-stamp	pro-rata	legal	ex-ante
Slovakia	74%	entry-exit	first come first served	Legal	pricing method
Poland	72%	distance	first come first served	Legal	ex-ante
Czech Republic	20%	post-stamp	first come first served	legal	ex-ante

Source: DG TREN Benchmarking Report 2005 and National Regulators

2. Consultation Process – Analysis of Stakeholder Positions

The SSE Consultation paper raises 12 questions. 14 Stakeholders submitted written comments on the consultation paper. Additional comments were brought up during the Stakeholder Group meeting on 28 September 2006 in Bratislava.

All respondents welcomed the Gas Regional Initiative (GRI) and found it useful, although opinions about its scope differ. An overall agreement exists about the need to improve hub trading

Hereinafter stakeholders' positions on the single discussion points are summarized and analysed.

2.1 Discussion point 1 – Priorities

The Consultation Paper suggests focusing on the following priorities for the SSE region. The GRI shall assess their current status, identify problems, suggest how to remove them and periodically monitor the outcome of undertaken actions. Transmission, storage and hub operators will be the main subjects of the activities.

I. Monitoring of regulatory involvement in compliance with the Gas Regulation

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- II. Practical case study: transport of gas through the region for specific transport profiles by fictive shippers
 - III. Transparency requirements covering access to storage and hub services
 - IV. Interoperability issues

Discussion point 1. Do you agree on such priorities? Are there any other issues to be included?

2.1.1 Stakeholders' positions

- **EFET:** EFET suggests that priorities have to include providing information transparency as well as free capacity, non-discriminatory access to all services, capacity trading and market-based balancing on a regional basis.
- **TAG:** TAG suggests that contractual conditions of the suppliers as well as conditions and climate for investments should also be included into the priorities.
- **CENTRAL EUROPEAN GAS HUB:** CENTRAL EUROPEAN GAS HUB sees improvement of conditions for trading activities as important priority which has to be included. Another one is additional sources of gas.
- **RWE Transgas Net:** RWE Transgas Net does not suggest any new priority. They are explaining how our priorities should be driven to reach the goal.
- **SPP Preprava:** SPP Preprava basically agrees with the priorities. They suggest that investment climate issues should also be included.
- **OMV GAS:** OMV GAS considers all four listed areas as important. They suggest that the following priorities should also be included:
 - Facilitating efficient investment into gas infrastructure mainly by creating a conducive investment climate, stable and predictable regulatory framework and use of one stop shop principle.
 - Producing a vision/scenario how the SSE region will develop over the next 10 – 15 years to understand and interpret bottlenecks and potential extension plans and also to have a vision of the possible development of the pipeline system.
 - Implementation of interconnection agreements and OBAs
 - Enhancing security of gas supply via diversification of source and routes (and storage facilities) by supporting the Nabucco project and treatment of creating excess capacity in a positive way.
- **Eurogas:** Eurogas recommends hub development and all connected issues as a priority. It is agreed that interoperability is also very important. They advise better coor-

dination regarding priorities in different regions within ERGEG. A general priority should be full and timely implementation of existing legislation and of the GGSSO.

- **Snam Rete Gas:** Snam Rete Gas agrees on the priorities.
- **SG meeting:** Several TSOs stressed the importance of a harmonized regulatory framework for investment in gas infrastructure and of harmonized implementation notably as regards short term capacity and cross border points.

2.1.2 Regulators' conclusions

No stakeholder disagreed with the suggested priorities. Some stakeholders recommended the inclusion of additional action points to be treated within the scope of the REM SSE. Especially three additional points should be considered: investment climate issues, hub development and implementation of interconnection agreements and OBAs should be addressed within the region.

2.2 Discussion point 2 – Implementation of Regulation 1775/2005/EC

The suggested priority 1 addresses monitoring of regulatory involvement in compliance with the Gas Regulation 1775/2005/EC. Regulators and stakeholders shall in particular assess whether any minor or major modifications of primary and secondary legislation and system operation rules and procedures are needed to meet the requirements of the Regulation.

Discussion point 2 invited stakeholders to comment on the implementation of the Regulation and to suggest in which areas and countries action may be necessary.

2.2.1 Stakeholders' positions

- **ENI:** ENI's opinion is that not implemented areas of Regulation 1775/2005 and identified gaps have to be assembled. On this the main role has to be played by the regulatory authorities.
- **CENTRAL EUROPEAN GAS HUB:** CEGH's opinion is that Regulation 1775/2005 is sufficiently implemented in Austria. They already gave their operational comments in the process of the establishment of the "Market rules".
- **RWE Transgas Net:** RWE Transgas Net complies fully with the Regulation as of 1 July 2006. They are surprised that ERGEG only now suggest a monitoring exercise regarding Regulation 1775/2005.

- **RWE Transgas:** RWE Transgas supports the development of an organized market for secondary storage capacity and enables sale of gas in storage.
- **SPP Preprava:** SPP – Preprava does not see tariffs in the investigated markets as an obstacle to regional market functioning.
- **OMV GAS:** Comment of OMV GAS is that they comply with Regulation 1775/2005. They do not see any need to additionally comment on the status of its implementation. Stakeholders like shippers may ask for corrections and improvements.
- **Eurogas:** Eurogas believes that it is important to avoid duplication of information gathering. Access Regulation has to be followed by TSOs. Implementation of the GGPSSO is another priority, whereas the emphasis on monitoring regulatory involvement is less clear. Regarding the tariffs, consideration should also be given to the impact of taxes and fees. It is also important to pay attention to the compatibility of metering with balancing rules.
- **Snam Rete Gas:** Short-term capacity services according to the Regulation 1775/2005 will be available during next thermal year. Snam Rete Gas is fully compliant with the dispositions defined by the Italian regulator. Harmonization among different regulatory frameworks is seen as a key point to be addressed within the GRI.
- **SG meeting:** Some TSOs questioned the correctness of some results in the presentation. Eurelectric underlines the importance to check not only the level of compliance with the provisions of Directive 2003/55/EC and Regulation 1775/2005 but also how the requirements are implemented; implementation has to reflect the sense not only the wording; harmonized implementation would be of utmost importance with regard to cross border transports. MOL noted that TPA rules are almost ready in Hungary. Gaz system remarked that the Kondratki entry point is for transit only. SPP underlined problems arising from increasing pipeline competition and pointed at upstream gas availability as the main problem.

2.2.2 Regulators' conclusions

Stakeholder comments on the implementation of the Regulation differ in accordance from which country they are coming. Most TSOs affirm that they are complying with the requirements of the Regulation. Stakeholders should be invited to explain reasons for non-implementation of requirements of the Regulation and date of implementation. The implementation process should be monitored within the REM SSE. Monitoring (e.g. Transparency, GGPSSO) on ERGEG level should not be doubled. TSO are invited to comment the evaluation done by the Regulators. It is proposed to check the implementation of all relevant requirements of the Regulation till end of October 2006.

2.3 Discussion point 3 – Implementation of Directive 2003/55/EC

The Consultation paper suggests that the monitoring exercise shall also comprise an assessment of the implementation status of the 2nd Directive, in particular as well verifying the scope and guidelines of regulatory powers.

Discussion point 3 invited stakeholders to signal in which areas and countries the implementation of the 2nd Directive is inadequate.

2.3.1 Stakeholders' positions

- **TAG:** TAG believes that the balancing rules have to remain in the sphere of competence of the TSO and that they have to be applied homogeneously.
- **ENI:** ENI's opinion is that not implemented areas of 2nd Directive and identified gaps have to be assembled. By this the main role has to be played by the regulatory authorities.
- **CENTRAL EUROPEAN GAS HUB:** CEGH believes that all provisions of the 2nd Directive have been sufficiently implemented in Austria. They already proposed their operational comments in the course of the establishment of the "Market Rules".
- **RWE Transgas Net:** RWE Transgas Net believes that the Directive does not give any particular powers to the regulatory authorities in respect of legal unbundling of accounts.
- **RWE Transgas:** RWE Transgas suggests that the regulatory body (ERU) needs a higher degree of independence from the executive power.
- **SPP Preprava:** SPP Preprava does not fully understand the purpose of the GRI concerning some of the issues like detailed unbundling rules.
- **OMV GAS:** OMV GAS thinks that the 2nd Directive has been sufficiently implemented in Austria. They do not see any need for more detailed unbundling rules.
- **Eurogas:** Eurogas's opinion is that not implemented areas of 2nd Directive and identified gaps have to be assembled.
- **Snam Rete Gas:** The 2nd Directive has been implemented in the Italian gas system. A harmonization of the regulatory frameworks in different MS seems necessary.

2.3.2 Regulators' conclusions

Most stakeholders agree that correct implementation of the 2nd Directive is essential. Two of them think the Directive is sufficiently implemented. Gaps in implementation were identified with regard to unbundling as can also be seen from the initiated infringement procedures against some Member States. Within the REM SSE implementation gaps should be monitored.

2.4 Discussion point 4 – Case Studies

The suggested priority 2 for the SSE region proposed practical case studies of gas transportation through the region for specific profiles (routes)⁴ by fictive shipper will be performed in order to effectively verify reasons of low hub effectiveness and lack of liquidity in the SSE. This shall be undertaken by a “check list” covering:

- Is the selected profile viable?
- Is it currently used by several shippers? What are their shares?
- Are capacity data published?
- Is spare capacity available on a long term and/or short term basis?
- Which capacity allocation methods are used (first come first served, auctions, open season, other)?
- Are capacity release or “Use it or lose it” clauses currently used? How?
- Which tariff methodology is applied (entry exit, postage stamp, distance etc.)?
- Can tariff levels be provided for selected routings and standard transportation patterns?
- Can the rates of return of the concerned pipelines be defined or estimated? Are they derived from negotiated or regulated settings?
- Is transit and domestic transportation handled in a different way by TSOs? Is there any cross-subsidization between them?
- Is there any secondary capacity trading, by private negotiation, or through a public board?
- Are there any access conflicts? Are they settled by the Regulator, the Competition Authority, the Ministry?
- Are backhaul services available? Are they actually used?

⁴ Routes: [1] RUS-SK-CZ-GER (Velke Kapusany - Waidhaus or Hora Svate Kateriny); [2] RUS-SK-A-SI-I (Velke Kapusany - Goricia); [3] RUS-SK-A-I (Velke Kapusany - Tarvisio); [4] RUS-SK-A-GER (Velke Kapusany - Oberkappel); [5] RUS-PL-GER-CZ (Bobrowniki or Kondratki – Mallnow - Hora Svate Kateriny)

- Are gas supplies available upstream? Which are the sources and their features?
- Is trade hampered by cross border inconsistencies as regards capacity or tariff settlements (e.g. non-matching zones, capacity allocation periods and criteria, balancing requirements)?
- Is lack of access to storage a problem?
- Is trade hindered by regulated end user prices, which may not be cost reflective or affected by cross subsidies?

Discussion point 4 invited stakeholders to signal difficulties they may have encountered in the use of transportation routes in the SSE region, by considering the above check list.

2.4.1 Stakeholders' positions

- **SPP:** Case studies should also include routes connecting non-Russian gas supply sources with the SSE region.
- **TAG:** Rules for TSOs cannot improve the liquidity on hubs without sufficient supply situation.
- **Eurogas:** The practical case studies are too limited in scope. Development of a regional hub and the relevant infrastructure should be a priority.
- **RWE Transgas Net:** Co-operation of regulatory authorities is absolutely essential. Regulatory authorities should check transportation on those sections of the profile that are not subject to their regulatory oversight.
- **OMV Gas:** OMV Gas agrees that measures have to be taken to promote hub trade in the SEE region. Investigation of different supply routes seems to be a reasonable and practical approach. OMV Gas will contribute to the assessment of the transport routes but proposes to leave out some questions while adding others. Not all of the 5 transit routes proposed are relevant for the liquidity in the SSE region. Important issues to deal with in order to raise hub liquidity are upstream infrastructure and diversification of supply sources.
- **Central European Gas Hub:** Hubs might play an important role in supporting the utilization of interruptible transportation services by establishment of a backup trading platform.
- **E.ON Földgáz:** The expected member states should also be taken into account regarding the SSE region development plans.
- **Snam Rete Gas:** Currently spare transportation capacity is available at the entry points Tarvisio and Gorizia.
- **SG meeting:** SPP stresses that a transmission profile, connecting a non-Russian gas supply source with an output point within the SSE region, should also be considered.

In addition, availability of gas is seen as the main problem by SPP. RWE considers that interconnections with Germany and France should also be considered.

2.4.2 Regulators' conclusions

Some stakeholders found the scope of case studies too narrow and proposed to include additional aspects such as upstream infrastructure and diversification of supply routes.

Against the background that transportation for new shippers on either of the 5 routes is not possible mainly due to no available firm capacities, lack of transparency (information on available capacity) and interoperability problems (OBAs, nomination procedure) detailed analysis between the relevant TSOs and Regulators should be done to identify the key barriers. The role of Hubs in supporting the utilization of interruptible transportation services by establishment of a backup trading platform should be added to the details analysis.

Reverse flow routes, notably service from Southern Mediterranean countries to the SSE region through Italy, should also be analysed.

2.5 Discussion point 5 – Availability of Services

The suggested priority 3 addressed transparency requirements covering access to storage and hub services. In this context the following items should be verified:

- Is access to storage services separately available?
- Are (or could, in principle) storage services of the country used by foreign parties?
- Is storage regulated?
- Are other domestic or foreign storage and flexibility service providers available?
- Is storage in the country subject to public service obligations including those related to security of supply?
- Are hub services available (e.g. Title transfer, Matching nomination, Parking, Loaning)?

Discussion point 5 invited stakeholders to signal availability of such services and to suggest steps that may facilitate their introduction, by considering the above check list.

2.5.1 Stakeholders' positions

- **CEGH** : Interoperability is essential to enable trading activities. Harmonized business environment will enable and enhance intraday trading activities (eg. nomination rules, gas quality and OBAs recommended by EASEE Gas); Availability of additional gas

sources is the most important factor for liquidity (reference to the importance of the Nabucco project)

- **RWE Transgas:** Storage services of SSOs operating in the Czech Republic are used by foreign parties. RWE Transgas, as storage system operator, enables title transfer of gas in storage, executes matching of nominations between storage and transmission systems, facilitates secondary market in storage capacity by operating a bulletin board, and offers unbundled and interruptible storage products. No hub formally operates in the Czech Republic.
- **OMV Gas:** All storage services so called “unbundled services” offered by OMV Gas such as Injection Rate, Withdrawal Rate and Working Gas Volume are available as separate services and are even offered on a daily basis. Interruptible storage services are offered too. For the Austrian market additional storage services are also available from the Slovak storage system operator “Pozagas” Additional flexibility services are offered by the Central European Gas Hub (CEGH) and RAG the second SSO in Austria
- **ENI:** To create effective liquidity it is necessary to introduce
 - standard contracts to reduce transaction costs
 - contractual transparency and simplification.
 - specific procedures to admit operators to sell or buy in the hub to avoid speculative behaviours
 - harmonized balancing and metering regimes in view of their interdependency with gas allocation and balancing rules, with the aim of the future development of hubs working as effective Gas Stock Exchanges.
- **Eurogas:** Access to storage services should be separated from hub development and services. The implementation of the GGPSSO should be monitored. ERGEG`s work can be used, to avoid duplication. It is very important, however, to check if the services are meeting market needs. Similarly work on reviewing the other services required by Hubs and to meet PSO obligations needs to be carried out.
- **EFET:** Efficient evolvement of trading at hubs located in between different transit systems (particularly Baumgarten) functioning as physical hubs, implies convenient transportation to and from hub locations. In this respect the harmonization of the business environment of the hub itself, including the balancing regimes, in combination with ambient transportation systems seems to be essential for customized trading activities. Beside the implementation of uniform gas days for nomination cycles, uniform gas quality, Operating Balancing Activities (OBAs) are increasingly important in order to facilitate comprehensible allocation processes
- **Snam Rete Gas:** Snam Rete Gas has set up a virtual trading point (PSV) where shippers can perform bilateral transactions on a daily basis which leads to flexibility on the market.
- **SG meeting:** Eurogas clarifies that only within the GRI hub development and storage services should be looked at separately.

2.5.2 Regulators' conclusions

All stakeholders support the development of efficient trading activities at hubs feasible by harmonizing the business environment. Main barriers are seen in different nomination procedures, gas quality, gas day and missing OBAs. Additional gas sources as a precondition for liquid hub trading is linked with the question of incentives for new infrastructure investment in the regulatory regime. Against this background harmonizing the business environment and Interoperability issue should be prioritised to enable efficient trading activities. Regulators and TSOs of the Region should work on harmonization of nomination procedures, gas quality requirements and gas day definitions in Standard Transportation Contracts of neighbouring the TSOs and put pressure on finalization of OBAs between Transit TSOs in the Region.

Stakeholders share the opinion that transparent and effective access to storage facilities in the region should be pushed by evaluating the market needs in context of the services offered. ERGEGs GGPSSO-Monitoring should not be doubled.

2.6 Discussion point 6 – Interoperability

The suggested priority IV of the SSE region addresses interoperability.

Discussion point 6 asked stakeholder to indicate interoperability issues in the SSE region hindering competition in the SSE region.

2.6.1 Stakeholders' positions

- **EFET:** The SSE region, consisting mostly of rather small grid operators which could be considered of insufficient size with respect to gas grid operation should serve as an example for enhanced inter-TSO co-operation and an effective one-stop shop and an area where a hub provides for regional services. Establishments of OBAs are necessary also to ensure that trading activities are not endangered by rather artificial physical mismatch issues. Restricted access to facilities and services matching gas qualities can hamper trading activities.
- **Eurogas:** The sort of areas in which TSOs could co-operate better include: information provision, based on common definitions and principles; more consistent and coherent approaches to CAC, CAM and CMP, especially at cross-border points; harmonisation of nomination and renomination procedures; regional approach to balancing and related issues; gas quality issues and business rules. Inconsistent approach among TSOs to exceptions to Force Majeure is also a hindering issue. Not a single contract is necessary but a more coherent, consistent and streamlined approach.

- **CEGH:** OBAs are definitely necessary especially for Baumgarten. Uniform gas qualities, uniform gas days concerning nomination cycles (as recommended by EASEE Gas proposals) are other important issues contributing to a harmonized business environment desperately needed for further development of more liquid trading activities.
- **RWE Transgas Net:** The fact that there are interconnection agreements in place does not mean that interoperability issues have been solved. Gas quality does not seem to be a problem now, but in the future it may be as a consequence of changing flow patterns.
- **OMV Gas:** No big quality issue. Enforcement of OBAs cannot be seen as an option for Austria, only a voluntary implementation, as the market based balancing model for the Austrian domestic market would possibly force the Austrian TSOs to purchase gas at prices they cannot influence. OMV Gas intends to conclude Interconnection Agreements with operating and balancing regimes at all interconnection points with the neighbouring TSOs.
- **RWE Transgas:** Interoperability issues between storage and transmission systems in the Czech republic do not hinder competition. Interconnection agreement between SSO and TSO including also OBA provisions is on place.
- **SPP:** Conditions of individual shippers, under which they are able to deliver or transit gas quantities to/through the SSE region, are foremost predetermined by the provisions of their gas supply agreements with the supplier, which TSOs in the region are not able to modify or mostly even to recognize. The role of the TSO mostly lies with providing non-discriminatory conditions of network access and gas transmission to shippers, once they have crossed the border of the EU.
- **E.ON Földgáz:** A strong co-operation is necessary also between the SSOs and the TSOs for supporting the interoperability (e.g. swap actions).
- **ENI:** It is necessary to develop and harmonize metering regimes in view of their interdependency with gas allocation and balancing rules, with the aim of the future development of hubs working as effective Gas Exchanges. Accuracy of gas allocation, and consequently of balancing terms and penalties, depends even on metering methods and timetable.
- **TAG:** Interoperability agreements e.g. IPA and OBA and of gas quality parameters have to be homogenous on European level and have to be applied on the whole transmission system.
- **Snam Rete Gas:** Snam Rete Gas and the main upstream TSOs have defined specific Interconnection Agreements.
- **SG meeting:** RWE Transgas Net and OMV Gas stress that OBAs with Naftogas and Gazexport are a problem. OMV Gas adds that balancing regimes are different throughout the region and different tolerance levels are also a problem. However the OSS service should be developed by market forces.

2.6.2 Regulators' conclusions

All of the stakeholders think that interoperability issues are generally hindering competition in the region and enforcement of OBAs, more consistent and coherent approaches and harmonised regimes and procedures are necessary to more liquid trading activities. Nowadays gas quality is not a problem, but in the future it may be because of changing flow patterns.

OBAs are definitely necessary at all interconnection points between neighbouring TSOs. Uniform gas qualities, uniform gas days concerning nomination cycles (as recommended by EASEE Gas proposals) are important issues for further development of more liquid trading activities. All TSOs in the region should indicate when they will conclude Interconnection Agreements with operating and balancing regimes at all interconnection points with the neighbouring TSOs and whether there are any barriers to do this.

2.7 Discussion point 7 – Guidelines for Capacity Reservation, One Stop Shop

The Action Plan for the SSE region suggests that regulators of the region should agree on common guidelines for capacity reservation (one stop shop principle); including provisions for interruptible services and capacity release in case of commercial congestion. Such guidelines may be more precise than those required by the Regulation and specify capacity lots to be offered by size and duration, including a common allocation procedure, and consider implications of the European Court of Justice decision - 7 June 2005, C-17/03.

Discussion point 7 asked stakeholders whether they agree with this proposal or whether any other solution to the congestion management would be preferable.

2.7.1 Stakeholders' positions

- **CEGH:** Supporting the utilization of interruptible services by establishing a back up trading platform. In case of interruption a Hub can play a trading platform for parking and trading.
- **OMV Gas:** Guidelines should not be applied only to specific routes but to all routes in one region to new or available transportation capacity only on a short term basis. For the investment needed to ensure the availability of sufficient transportation capacity, long-term transportation contracts will remain crucial. The one-stop-shop principle is currently under adoption in Austria involving different national TSOs. The one-stop-shop principle crossing national borders involves international TSOs as well. It seems reasonable to foresee a one-stop-shop provider acting as an agent for cross-border shippers. The performance of the One stop shop service should be left to market initiative.

Concerning a common allocation procedure there is no need for additional regulatory intervention. TSOs shall provide appropriate economic signals for the efficient and maximum use of the technical capacity.

- **RWE-Transgas Net:** If any guidelines should be developed then they should be developed by the relevant TSOs in accordance with Article 5 and Section 2 of the Regulation. It must be avoided to treat same users in a different way.
- **TAG:** Feasible UIOLI principle will be a possible solution regarding congestion problems, but it has to be applied at European level.
- **ENI:** In a wide interpretation the OSS principle could imply improperly the introduction of a single independent system operator in the regional/european market. In Eni's view this point is not realistic considering the very different legal, industrial and market framework in SSE regional market. Eni believes that activities related to the OSS principle are linked to the commercial part of the natural gas chain (i.e. shipping, optimization of capacity booking). The simplification of access to gas transportation system managed by different TSOs should be obtained through the harmonization of regulatory frameworks avoiding the administrative introduction of single operators, thus in practice imposing legal monopoly on shipping activities. In a harmonized regulatory framework the activities linked to the OSS principle should be left to the market forces.
- **Eurogas:** Consistent rules for capacity reservation, interruptible service availability and capacity release to address congestion management are helpful. Experience with the Regulation in the light of the Interpretative Notes should be gained before further proposals are made. With regard to the "one stop shop" Eurogas favours in principle a service which would facilitate gas transport through different TSOs, but the OSS principle should be left to market forces. Today already some OSS systems are offered on the secondary market.
- **EFET:** The SSE region should serve as an example for enhanced inter-TSO cooperation and an effective one-stop shop.
- **Snam Rete Gas:** The introduction of a system for capacity reservation based on the one-stop-shop principle requires the definition of a unique transmission tariff at regional level. Once the regulations of the different systems are harmonized, it would be possible to institute an international agency coordinating the capacity booking process.
- **SG meeting:** TSOs voice scepticism about the need for a one-stop-shop provider and harmonized standard contracts. The introduction of a one-stop-shop provider should be left to the market.

2.7.2 Regulators' conclusions

Most stakeholders favour a service which would facilitate gas transportation through different TSOs. One TSO thinks it is reasonable to foresee a one-stop-shop provider acting as an agent for cross-border shippers. But most of the stakeholders propose the performance of the One stop shop service should be left to market initiative in a harmonized regulatory framework. To clarify the concept it is suggested to work on the model in two steps: First it should be analysed to introduce the concept under the current legal framework in the sense of a one-stop-shop provider acting as an agent for cross-border shippers, and the respective roles of regulatory harmonisation and the OSS agent should be analysed. Second step should be adjusted with the ongoing discussion of the Green Paper concerning EU Grid/Grid Code and Inter TSO-Cooperation.

Addressing harmonized congestion management procedures TSOs mechanisms should be monitored whether they fulfil market needs and the requirements of the Regulation.

2.8 Discussion point 8 – Regional Entry Exit Model

As the Roadmap stated, the regulatory framework (and the responsibilities and obligations of TSOs) as it currently stands is inadequate to deal with a sensible allocation of costs and risks, particularly where the principal beneficiaries of investments are located outside of the TSOs network – i.e. there is a regulatory gap which can impede investment. To remove this gap, Regulators should study a regional transportation tariff based on the entry-exit methodology, with a regional inter-TSO compensation scheme, based on the setting of a regulated allowed revenue for each TSO and its coverage by tariffs raised by TSOs (*Regional entry exit tariff*). Such system would be neutral to TSOs' revenues and could in principle be extended to third countries, notably Switzerland and the Balkan Republics.

Discussion point 8 asked stakeholders whether they agree with this proposal or whether any other solution to the tariff problem would be preferable.

2.8.1 Stakeholders' positions

- **SPP:** SPP does not consider tariffs a topic which should be treated by the GRI.
- **ENI:** ENI favours entry exit systems but points out that cross-subsidies and stranded costs should be avoided. The issue of a single capacity definition is important in this

context. Co-ordination between regulators is necessary to put in place the right conditions to encourage non-domestic investments.

- **TAG:** A regional entry exit system does not represent a good solution for transit. Tariffs for transit should depend in particular on distance. Inter-TSO compensation scheme seems hardly viable.
- **Eurogas:** Eurogas favours entry exit systems but recognizes that there is an incompatibility between the requirement for tariffs to be cost-reflective and the idea of a regional tariff to avoid pancaking. The regulatory gap can impede investment especially national regulators may not put in place the right conditions to encourage investment in another country. Better co-ordination between regulators is necessary.
- **RWE Transgas Net:** Entry exit system is not suitable since it would lead to discrimination(cross-subsidisation) of users.
- **OMV Gas:** A regional tariff might not be an appropriate measure to eliminate obstacles for investments. The use of long-term contracts to secure the investments will remain an essential element of existing and future pipeline projects. The application of specific tariffs for transit is certainly more appropriate than applying entry-exit tariff systems. The clear relationship between shipper and TSO is advantageous compared to any inter-TSO compensation scheme which we strongly reject.
- **Snam Rete Gas:** The introduction of a transportation tariff at a regional level needs careful study because it may lead to cross-subsidisation.
- **SG meeting:** RWE Transgas Net argues that the introduction of a regional entry-exit tariff system would lead to a loss of available capacity and expresses its reservation about the opportunity of such study. However Eurelectric, Efet and Eurogas support undertaking a preliminary study.

2.8.2 Regulators' conclusions

TSOs reject the development a regional entry exit tariff model or suggest caution as they see risks of not recovering costs or introducing cost subsidies. Shippers support the idea of a regional entry-exit system but also warn against the risk of cross-subsidies, standard costs, and stranded costs.

Against this background it is recommended to undertake a study to devise and simulate a proposal for a regional entry-exit tariff model under the current legal framework (national and European legislation, EU Gas Regulation 1775/2005/EC) but also to evaluate legal requirements to establish such a Regional Entry Exit System for cross border flows.

Until a Regional Entry Exit System can be established, harmonised regulatory tariff treatment shall be implemented according the ERGEG proposal expected for early 2007 under the current legal framework

2.9 Discussion point 9 – Guidelines on New Infrastructure

The Action Plan for the SSE region suggests developing common guidelines for the treatment of new gas infrastructure, including conditions to award exemptions from TPA rights after Article 22 of the Gas Directive, building on the work already undertaken by the Gas Regulatory Group for the Energy Community of South East Europe.

Discussion point 9 asked stakeholders whether they agree with this proposal or whether any other solution to the investment problem would be preferable.

2.9.1 Stakeholders' positions

- **ENI:** Open season principle should not be applied to existing capacity and not be obligatory, even to award exemptions. The need for new infrastructure should be determined through market signals.
- **TAG:** Incentives for new infrastructure should be the exemption from the existing regulatory framework. Open seasons are seen as no adequate solution.
- **Eurogas:** Exemptions for new infrastructure should be assessed on a case by case basis. Open seasons are the preferred form with regard to the initial allocation of new investment. Open seasons should not be an obligation.
- **RWE Transgas:** Agrees with the proposal.
- **RWE Transgas Net:** A key hindrance to investments is the regulation and access regime. Greater use of the exemption procedure as set out in Art. 22 of the Directive should be made in order to encourage investments.
- **OMV Gas:** Granting exemptions according to 22 of the Directive might be a suitable instrument to stimulate new investments. Co-operation of regulators involved is important and shall be undertaken on a case by case basis. Uniform treatment of a pipeline project in different countries is necessary to mitigate risk.
- **Snam Rete Gas:** Snam Rete Gas favours the definition of common guidelines for new infrastructure at a regional level. A key point for investments is a stable, transparent and harmonized regulatory framework.
- **SG meeting:** TSOs call for a stable regulatory framework and especially rate of return stability as a precondition for new investments. EFET points out that Art. 22 exemptions should be considered on a case by case basis and should not be the rule.

2.9.2 Regulators' conclusions

All stakeholders agreed that investment is the key to improved competition and security of supply. Also, all of them said that exemptions under Article 22 of the directive are useful to promote investment, and that open season may be a useful tool of defining investments and sharing their costs. Stakeholders stress that exemption should be limited and not the rule, and recall that they must be awarded on a case by case basis. TSOs see the award of exemptions as the main way to promote investment. Most respondents support the adoption of Guidelines as a way to stabilise and harmonise regulatory regimes, others suggest regulatory co-ordination. It is proposed to follow the concept of Common Guidelines for the treatment of new gas infrastructure with common conditions to award exemptions from TPA rights after Article 22 of the Gas Directive, based on regional market assessment and joint regulatory decision for the whole infrastructure with common capacity definition and reservation procedure. The application of this approach should be based on work already undertaken for the Energy Community.

A common understanding of market needs is necessary, against which exemptions and other regulatory solutions may be more appropriately assessed. This can be appropriately provided by regional TSOs.

2.10 Discussion point 10 – Balancing Guidelines

The Action Plan for the SSE region suggests developing common guidelines for balancing, including the setting of balancing time units, tolerances and charges, and provisions for ex-post trading.

Discussion point 10 asked stakeholders whether they agree with this proposal or whether any other solution to the balancing problem would be preferable.

2.10.1 Stakeholders' positions

- **EFET:** Harmonisation of balancing rules is essential. It is a priority aiming for market-based balancing on a regional basis throughout Europe (this means 4-5 balancing areas), and provision of within-period information e.g. by the TSOs and the goal to achieve as long balancing periods as technically and economically sensible.

- **Eurogas:** Eurogas supports the harmonisation of balancing rules and the definition of Balancing Guidelines by ERGEG. Differences in neighbouring networks do impact on the development of competition and impose costs on connected markets. A regional balancing point at which imbalances are traded would develop more significant trading possibilities, giving added value to suppliers in optimizing their portfolio. This should be an objective. However, they can accept the co-existence of different, but compatible balancing regimes with instruments to avoid unfair penalties.
- **CEGH:** Well established procedures are implemented for the Austrian domestic market. CEGH shall be prepared to serve as ideal platform in providing market-trade mechanisms for placing balancing volumes for the disposal of TSOs.
- **RWE Transgas Net:** ERGEG guideline should be used after conclusions having drawn from consultation. It is not clear, why any other guidelines for balancing should be defined for SSE REM.
- **OMV Gas:** Common Guidelines with principles, detailed balancing rules on country-by-country basis.
- **ENI:** It would be necessary to conceive, initially, hubs as balancing points. Nowadays, different balancing and metering regimes in force in the SSE region, are not consistent and do not allow timely information on data related gas allocations. For this reason initially hubs should be conceived as balancing point where operators are allowed to compensate their imbalanced gas position. The harmonisation and development of balancing regimes could lead to the development of hubs conceived as supply and trading points.
- **TAG:** Guidelines for overall principles, detailed balancing rules on country-by-country basis, in the competence of the TSO. Balancing rules have to be applied homogeneously on the whole system. These have to involve the relevant TSOs and the suppliers (producers).]
- **Snam Rete Gas:** Snam Rete Gas agrees with the proposal but considers ex-post trading as inconsistent with market based balancing mechanism.
- **SG meeting:** CEGH offered to deliver their experience on the question whether a Hub can play a regional balancing point. This input was welcomed by the chair.

2.10.2 Regulators' conclusions

Most of the stakeholders think that harmonisation of balancing rules are essential.

Traders demand market-based balancing is needed on regional basis. The possible initial role of hubs, as regional balancing points is emphasized.

Against this background it is recommended to monitor the implementation of the ERGEG Balancing Guidelines and whether modifications are necessary from the Regional level point of view where the two existing Hubs can serve as regional balancing point with market-based elements in balancing.

2.11 Discussion point 11 – Transparency Guidelines

The Action Plan for the SSE region suggests to develop guidelines of good practice on transparency and information management at EU level especially addressing transparency requirements not sufficiently addressed in existing European legislation.

Discussion point 11 asked stakeholders whether they agree with this proposal or whether any other solution to the transparency issue would be preferable.

2.11.1 Stakeholders' positions

- **CEGH:** Full transparency on hub services already available.
- **OMV Gas:** Any guidelines or code of conduct to be adopted by the industry shall not extend TSOs' obligations under the Directive and the Regulation.
- **RWE-Transgas and RWE Transgas Net:** The existing Guidelines for Good Practice should be sufficient for transparency and information management. These guidelines have also been largely implemented by TSOs and SSOs.
- **TAG:** There should be no additional obligation for the TSOs to compile data in an extended way (additional costs).
- **Eurogas:** Support the proposal for regional Guidelines of good practice on transparency and information management.
- **Snam Rete Gas:** Transparency is appropriately covered by the existing European legislation.

2.11.2 Regulators' conclusions

All stakeholders except Eurogas state that the existing requirements of the Regulation and GGPSSO are sufficient in context of transparency. Against this background it is recommended to assess the status quo of compliance with the transparency requirements of the Gas Regulation. This will be done by the present questionnaire addressed to regulatory authorities by ERGEG. The aim is to assess the status of compliance of TSOs with the transparency requirements of Regulation 1775/2005. To identify the need for possibly more detailed transparency requirements and/or modification of existing provisions of the Gas Regulation relevant information will be collected within the Regional Initiative.

2.12 Discussion point 12 – Intergovernmental Agreements

The Action Plan for SSE suggests that Member States of the region should ensure, their commitment towards a consistent gas market regulation in the SSE, as well as harmonization of regulatory powers in line with the Gas Directive and Regulation.

Discussion point 12 asked stakeholders whether any special intergovernmental agreement between SSE countries, ensuing enhanced cooperation on a regional basis would be feasible and useful and which issues it should cover.

2.12.1 Stakeholders' positions

- **Edison Stoccaggio:** Cooperation between member countries is highly desirable on topics like security of supply and the control emergency situation.
- **SPP:** SPP does not see the idea of a regional intergovernmental MoU in whichever form viable.
- **Eurogas:** Intergovernmental agreements not necessary in the EU.
- **RWE Transgas Net:** There is no need for concluding a MoU.
- **OMV Gas:** No intergovernmental arrangements are needed. Existing European legislation is sufficient.
- **Snam Rete Gas:** A special intergovernmental agreement between SSE countries could be a key point in the achievement of harmonizing rules and market opening.

2.12.2 Regulators' conclusions

Most of the stakeholders expressed the opinion that special intergovernmental agreements between SSE countries are not necessary under the current EU legal framework. It is recommended not to follow on that issue.

3. Summary

In addition to the issues proposed in the consultation paper stakeholders express the inclusion of additional action points to be treated within the Regional Initiative. Especially three additional points should be considered:

- investment climate issues
- hub development and
- implementation of interconnection agreements and OBAs.

Most stakeholders agree that the correct implementation of the 2nd Directive and the Gas Regulation 1775/2005 is essential and has highest priority. To identify the main gaps stakeholders should be invited to explain reasons for non-implementation of requirements of the Regulation and date of implementation. In addition the implementation process should be monitored within the REM SSE. Monitoring (e.g. Transparency, GGPSSO) on ERGEG level should not be doubled.

Transportation for new shippers on any of the 5 routes is not possible mainly due to no available firm capacities, lack of transparency (information on available capacity) and interoperability problems (OBAs, nomination procedure). Detailed analysis between regulators and TSOs should be done between the relevant TSOs and regulators to identify the key barriers in relation to the availability of hub, storage and flexibility services. The role of hubs in supporting the utilization of interruptible transportation services by establishment of a backup trading platform should be added to the details analysis.

Harmonizing the business environment and Interoperability issue should be prioritised to enable efficient trading activities. Regulators and TSO of the Region should work on harmonization of nomination procedures, gas quality requirements and gas day definitions in Standard Transportation Contracts of neighbouring TSOs and put pressure on finalization of OBAs between transit TSOs in the Region.

All stakeholders favour a service which would facilitate gas transportation through different TSOs. To clarify the “One stop Shop” concept it is suggested to work on the model in two steps: First it should be analysed to introduce the concept under the current legal framework in the sense of a one-stop-shop provider acting as an agent for cross-border shippers. Second step should be adjusted with the ongoing discussion of the Green Paper concerning EU Grid/Grid Code and Inter TSO-Cooperation. Addressing harmonized congestion management procedures TSOs mechanisms should be monitored whether they fulfil market needs and the requirements of the Regulation.

It is recommended to undertake a study to devise and simulate a proposal for a regional entry-exit tariff model under the current legal framework (national and European legislation, EU Gas Regulation 1775/2005/EC) but also to evaluate legal requirements to establish such a Regional Entry Exit System for cross border flows. Until a Regional Entry Exit System can be established, harmonised regulatory tariff treatment shall be implemented according the ERGEG proposal expected for early 2007 under the current legal framework

It is proposed to follow the concept of Common Guidelines for the treatment of new gas infrastructure with common conditions to award exemptions from TPA rights after Article 22 of the Gas Directive, based on regional market assessment and joint regulatory decision for the whole infrastructure with common capacity definition and reservation procedure. The application of this approach should be based on work already undertaken for the Energy Community.

It is recommended to monitor the implementation of the ERGEG Balancing Guidelines and whether modifications are necessary from the Regional level point of view where the two existing Hubs can serve as regional balancing point with market-based elements in balancing.

It is recommended to assess the status quo of compliance with the transparency requirements of the Gas Regulation. This will be done by the present questionnaire addressed to regulatory authorities by ERGEG. The aim is to assess the status of compliance of TSOs with the transparency requirements of Regulation 1775/2005. To identify the need for possibly more detailed transparency requirements and/or modification of existing provisions of the Gas Regulation relevant information will be collected within the Regional Initiative.

In any case work done on CEER and ERGEG level should not be doubled – taking into account the current (2006) CEER and ERGEG work programme the following items suggested by stakeholders are already covered on ERGEG/CEER level

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- Monitoring of GGPSSO
 - Monitoring of the Transparency requirements of Regulation 1775/2005
 - Cross Border Tariffication
 - Interoperability

The implementation of the final action points of the Region will have as well to take into account the CEER/ERGEG priorities 2007. Interference with priorities of the Region could concern monitoring of the ERGEG balancing guidelines, EU Grid (Code)/One Stop Shop, hubs and investment (market with (**)) in the table below).

4. The way forward

The following priorities have been identified following the written comments and the Stakeholder Group meeting on 28 September 2006. Please note that not all of the following points have been agreed upon unanimously.

- The completion of missing OBAs is necessary as soon as possible, the SG group will be convened once they are implemented.
- Monitoring of implementation of the requirements of the Regulation 1775/2005 and Directive 55/2003 should continue. The regulators will finalise this analysis by October 30, 2006 by means of a Checklist.
- On 24 November 2006 an Implementation Group meeting between regulators and TSOs will be held in Vienna to assess the barriers for transport through the region (5 routes) in detail. Routes 2 and 3 shall also be considered in the reverse sense (i.e. northbound).
- It is suggested to invite all relevant stakeholders to participate in a voluntary assessment whether the existing gas infrastructure meets the coming market demand in the region. The result of such an assessment should make transparent what extension of the gas infrastructure is necessary to meet the market demand. This so called “Long term planning on a regional level” shall compile data from TSOs, network users and regulators and investigate in a dynamic way
 - the available capacity at the entry points to the region
 - demand in all Member States of the region
 - available infrastructure capacities (transmission, storage, LNG)
- Regulators shall conduct surveys and draft analyses by the end of 2006 on the following subjects:
 - The role of hubs as regional balancing points

- The opportunity and requirements to introduce a regional entry-exit tariff system
- The requirements to introduce a one-stop-shop provider acting as an agent for cross-border shippers and its relationship with regulatory harmonisation

Work programme

AP	Task	Who	Deadline
1	Completion of OBAs	TSOs	asap
2	Monitoring the implementation of the requirements of the Regulation 1775/2005 and the Directive 55/2003	Regulators	30 October 2006
3	Implementation Group meeting assessing transport routes	Regulators and TSOs	24 November 2006
4	Assessment of the role of hubs as regional balancing points	AGEN	End 2006
5	Survey on requirements to introduce a regional entry-exit system	AEEG	End 2006
6	Survey on requirements to introduce a one-stop-shop provider acting as an agent for cross-border shippers	E-Control	End 2006