

ACER (Agency for the Cooperation of Energy Regulators)  
Trg republike 3  
1000 Ljubljana  
Slovenia

Brussels, 12 May 2014

***EASEE-gas contribution to ACER's public consultation on the preliminary scoping on potential Framework Guidelines on Rules for Trading***

Dear Madam or Sir

EASEE-gas appreciates the opportunity to comment on the Preliminary scoping document on potential "FG rules for trading related to technical and operational provisions of network access services and system balancing (FG RfT)".

EASEE-gas is representing most of the gas market segments within Europe. All our members are operating in different gas network systems, each with their own state of implemented and interpreted Network Codes (NCs). Interpretation of existing NCs and different time schedules of implementing them raises today already some difficulties amongst the stakeholders. Since most of the topics mentioned in the "Preliminary scoping document for public consultation" are already partly taken care of in existing NCs, EASEE-gas does not support the potential adoption of an additional set of rules which may lead to a new NC, because, as a general thought, enough time to both implement and evaluate the NCs recently approved by the European authorities has to be observed. If the market sees any omissions in the Guidelines on CMP and the Network Codes on CAM, Balancing and Interoperability & Data exchange, then it will be easier to amend the existing NCs at a later stage.

EASEE-gas opines that adding today another NC will negatively impact the survey ability of the relevant rules. Most importantly, the focus of all market participants should be aimed on implementing correctly existing Guidelines and NCs; it is only after their effect on the market has been thoroughly examined and evaluated, that any proposals on amendments of these NCs would make sense. We therefore support a greater effort around the harmonization on interpretation and implementation of the existing NCs in the different gas transport systems.

We thank you for the opportunity to provide input to this consultation and remain at your disposal for any queries you might have.

With best regards,

Peter Meeuwis on behalf of EASEE-gas Board  
EASEE-gas Chairman of the Executive Committee

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***About EASEE-gas:***

*EASEE-gas (European Association for the Streamlining of Energy Exchange - gas) was set up in 2002 in order to develop and promote business practices to simplify and streamline both physical gas transfer and trading across Europe. EASEE-gas presently has 90 full members (companies active in the European gas market) and 30 associate members (industry associations, regulators, government agencies, etc). For more information, please visit [www.easee-gas.eu](http://www.easee-gas.eu) or contact the office in Brussels.*