

## *GIE response to ACER's consultation*

# Preliminary scoping on potential Framework Guidelines on Rules for Trading

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## 1 Who is GIE?

Gas Infrastructure Europe (GIE) is an association representing the sole interest of the infrastructure industry in the natural gas business such as Transmission System Operators, Storage System Operators and LNG Terminal Operators. GIE has currently 69 members in 25 European countries.

One of the objectives of GIE is to voice the views of its members vis-à-vis the European Commission, the regulators and other stakeholders. Its mission is to actively contribute to the construction of a single, sustainable and competitive gas market in Europe underpinned by a stable and predictable regulatory framework as well as by a sound investment climate.

## 2 Introduction

GIE welcomes the opportunity to answer to this public consultation. GIE considers that the public consultation document should explain more in detail the reasons and arguments which lead ACER to consult a potential Framework Guideline on rules for trading. The document of the consultation does include not less than 32 questions but explanations why these questions have been chosen would be much appreciated and would help stakeholders to provide more valuable input.

## 3 Answer to consultation's document

Instead of answering the full set of questions GIE would like to highlight a more general view on the subject. Regarding the **“Rules for trading related to technical and operational provisions of network access services and system balancing”**, the scoping is still unclear, as well as its potential contribution to the achievement of the Internal Gas Market.

In recent years several important network codes for gas were developed with intensive involvement of stakeholders. New Network Codes refer to CAM and CMP, Balancing and Interoperability. These new rules are now in different stages of implementation. In addition the new Network Code on harmonised tariff structures and new principles regarding incremental and new capacity are under way. Both show already strong interrelation with the above mentioned Network Codes under implementation. Finally on regional level several projects for early implementation CAM/CMP are under way. The current network codes or codes under development will lead to substantial changes for the entire gas market.

Before introducing new rules the results of ACER's monitoring task on implementing the existing NC should be evaluated and consulted with stakeholders. Based on these results a scoping discussion should be started regarding a FG on Trading Rules. At this moment it is by far too early to start scoping a new Framework Guideline. Many questions of the public consultation cannot be seriously answered before implementation and reasonable adoption of respective procedures by market participants.



Consequently GIE proposes to restart the scoping after a reasonable time period of implementation of the existing Network Codes and monitoring exercise by ACER.