



19 May 2008
Ref: 08GTE+169

GTE+'s First Consultation Document

Stakeholder Feedback Proforma

Please send completed template, and/or any other feedback to gie@gie.eu.com by 31st July

Organisation:	European Federation of Energy Traders (EFET)
Name:	Established in 1999, the European Federation of Energy Traders (EFET) is an industry association representing over 90 trading companies operating in more than 20 countries. The EFET mission involves improving conditions for energy trading in Europe and fostering the development of an open, liquid and transparent European wholesale energy market. More information about EFET views and activities is available on www.efet.org and for gas issues from Ilaria.Conti@EFET.org

Q1: Does the programme identify the correct priorities for GTE+ focus during 2008/2009?

Answer	Further comments
Yes / no	In view of the 3 rd package proposals, ENTSOG Organisational Development, Winter Outlook and a Ten Year Network Development Plan are issues that GTE+ needs to address now. Transparency, Capacity Co-ordination, Procedure on Harmonization of Maintenance Publications, and the IT & Communications Roadmap appear to be issues that the TSO are working on already. The primary interest of our members regarding gas transmission is to improve access (and reduce risks) for capacity from one trading point to another. The core issues for us are 'what should TSOs be doing to make these improvements?' and 'are the issues on which GTE+ can add value included in the workplan?' Finally we note that at this stage the development of network codes is outside the scope of this workplan.

Q2: Are there any other priorities that should displace the priorities identified?

Answer	The aim of priorities is that they should result in the greatest useful improvements to the services offered by TSOs across Europe. We therefore place less emphasis on whether or not GTE have selected the right topics and more emphasis that the work done under each topic heading needs to deliver meaningful improvements across Europe.
Yes / no	

If yes;

What other priorities should be addressed?	Europe is in transition from a situation in which TSOs market their individual capacities separately, to one in which multi-system co-operation, sale of x-border capacity and sale of multi-system capacity is increasing. GTE+ should ensure that its workplan is aligned with these changes in the market. The GTE+ workplan should aim to promote an integrated
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	<p>European gas grid in which</p> <ul style="list-style-type: none"> a) the interconnected grids are efficiently optimised, as if operated by a small number of well-coordinated entities. b) shippers and traders have all the information available to assess the risks and opportunities, particularly for international trade c) there is a consistent approach taken by TSOs for sale of capacity and a consistent framework agreed by regulators for the development and allocation of new capacity.
Which elements of the plan should be displaced?	If any parts of the workplan are not helping to achieve an integrated grid then the activities should be re-focussed.

Q3: Are the objectives and deliverables associated with each plan realistic?

Organisational Development	If ENTSOG is to be formed then this activity is necessary, and needs to be completed before any network code work is formally underway.
Transparency Platform	Our priority is for TSOs to publish meaningful capacity and flow data. We would have preferred this capacity and flow data to have been the first phase of the project.
Winter Outlook	ENTSOG will be obliged to do this. The GTE+ assessment is of interest to market participants and needs to be more widely available.
Ten Year Network Development Statement	An ongoing development plan (revised annually to allow for longer-term changes) is an important element, but if this is just a sum of the individual TSO or National forecasts then we would be concerned about the lack of consistency and the sub-optimal result. GTE+ could add value by first publishing the (different) assumptions in each set of TSO or National forecasts. GTE+ could also help groups of TSOs to develop multi-system grid models that would start to reduce the current inconsistencies in the individual TSO or National forecasts.
Capacity Co-ordination	This is an important issue, and a report setting out all the capacity products offered by TSOs and the differences between them will be of interest. But does the content of the work proposed by GTE+ deliver practical improvements? A co-ordinated GTE+ approach to the assessment of new capacity (including Open Seasons), promoting the auctioning of primary capacity across borders, a GTE+ initiative to expand secondary capacity trading by (for example) establishing the Day Ahead pilot on other x-border points, including (for example) monthly capacity, helping all GTE+ members to implement the EASEE-gas capacity CBP, etc... are examples of such practical improvements.
Procedure on Harmonization of Maintenance Publications	This looks like a 'quick win' requiring limited resource as a more consistent approach would be an improvement. However there are more important (and more difficult) issues on which GTE+ could provide co-ordination, for example in relation to how TSOs could be merging balancing zones between different grids or even across international borders, how TSOs can contribute to a successful transition to consistent market-based balancing across Europe.
IT and Communications Roadmap	This is another important issue, but it is essential that all parties using an IT system are involved in the decision making. While GTE+ may need to co-ordinate and work on certain aspects amongst themselves, the overall roadmap should be agreed by a wide industry forum like EASEE-gas

Q4: If delivered in a timely and responsive manner would the programme defined in this document constitute a significant step towards the development of the internal market?

Answer	If 'responsive' means that the GTE+ workplan is adjusted to ensure that it starts to promote an integrated European grid then the answer could be 'yes'.
Yes / No	

Q5: Do respondents have any additional comments or remarks to make about:

The proposals to establish ENTSOG	ENTSOG should focus on cross-border or combined-system network issues that have an impact on Europe's wholesale gas markets.
The Work Programme envisaged in this document	
Anything else?	Once the process starts to deal with Network Codes that affect market participants, all stakeholders must have an equal opportunity to suggest amendments and to have them approved. If users are not part of the decision making process on the text of such network codes then it will be unrealistic to expect their input to consultation during the drafting phase.

Q6: Is there any advice/feedback you would like to offer GTE about how it can best facilitate the transition between today and implementation of the Third Package?

<p>GTE+ should include in the 2008/9 workplan a series of internal and external workshops to share the best-practice experience of TSO who have combined their grid operations or merged their balancing zones.</p> <p>and/or</p> <p>GTE+ should establish how an Operator for some chosen multiple transit and transmission systems could best maximise the firm capacity available to the market</p>
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Q7: Would you like to meet with GTE members to discuss the development of ENTSOG consultation and development processes?

Answer	GTE+ has kindly offered to meet with the EFET Gas Committee in London on 4 th September 2008, thank you..
Yes / No	

Please do not feel constrained by the sizes of the boxes above. GTE welcomes comprehensive feedback as critical part of establishing the GTE+ Work Programme