

**Eighth Meeting of the European Gas Regulatory Forum
Madrid, 8th and 9th July 2004**

**2 Compliance with Second
Guidelines for Good TPA Practice
for Transmission System Operators**

**Comments by the
European Federation of Energy Traders**

Observations on the CEER GGP II TSO compliance report

- All TSOs should aim to comply fully with GGP II
- Timing/Quality/Spirit of implementation are important
- Areas needing practical improvement:
 - access to information (processes and quality of data)
 - efficient and fair capacity allocation
 - congestion management and transparency in decisions
 - facilitation of capacity trading
 - cross-border co-operation
- Importance of an effective Regulator

Some targets for July 2004, accepted by TSOs in GGP II - Are these met?

- 1 Offer firm and interruptible services with a minimum contract duration of one day
- 2 Provide market participants with sufficient, well-timed and reliable on-line based information
- 3 Publish physical booked and available capacities for monthly periods at all relevant points
- 4 Publish regular up-dates of short term capacity availability
- 5 Publish historical maximum and minimum monthly use of capacity and annual average flows for the past 3 years

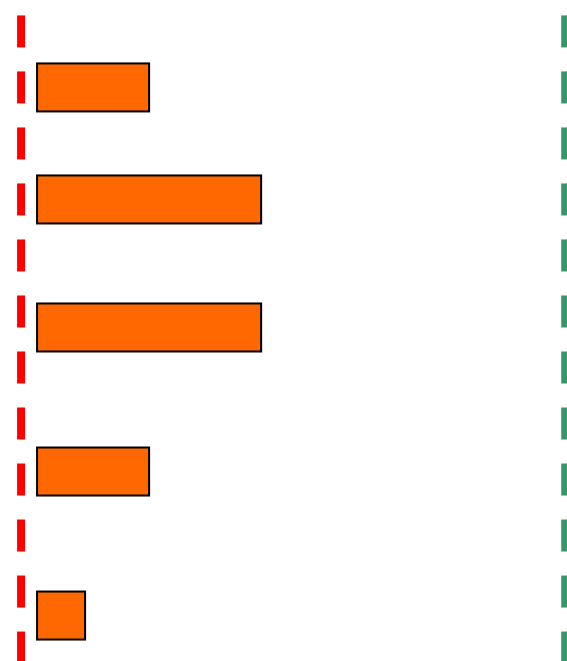
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Illustrative examples...

- 1 Firm and interruptible services
- 2 Reliable online information
- 3 Publish all points' available capacity
- 4 Update short-term capacity regularly
- 5 Publish historical use of capacity

No
Compliance

Full
Compliance



Transparency is Essential for Fair and Non-Discriminatory Access

- 2003/55/EC requires System Operators to provide users with the information they need (Art. 8.1.d)
- EFET Gas Committee, May 2004 - “Gas Market Information Requirements”
- Quality of service is important, not just ‘ticking boxes’