

OPINION No 20/2019
OF THE EUROPEAN UNION AGENCY
FOR THE COOPERATION OF ENERGY REGULATORS

of 8 October 2019

ON THE ENTSOG's ANNUAL REPORT 2018

THE EUROPEAN UNION AGENCY FOR THE COOPERATION OF ENERGY REGULATORS,

Having regard to Regulation (EU) 2019/942 of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators¹ (ACER), and, in particular, Article 4(3)(b) thereof,

Having regard to the favourable opinion of the Board of Regulators of 24 September 2019, delivered pursuant to Article 22(5)(a) of Regulation (EU) 2019/942,

Whereas:

1. INTRODUCTION

- (1) On 12 June 2019, the European Network of Transmission System Operators for Gas (ENTSOG) published its Annual Report 2018 pursuant to Article 8(3)(b) of Regulation (EC) No 715/2019. ENTSOG's Annual Report 2018 provides a high-level review of ENTSOG's activities and deliverables for 2018, while also providing forward-looking views on the role of gas infrastructure.
- (2) Pursuant to Article 4(2) of Regulation (EU) 2019/942, ACER shall monitor the execution of the tasks of ENTSOG in accordance with Article 9 of Regulation (EC) No 715/2019. Pursuant to Article 4(3) of Regulation (EU) 2019/942, ACER may provide an Opinion to ENTSOG, *inter alia*, on the relevant documents referred to in Article 8(3) of Regulation (EC) No 715/2019, which include ENTSOG's Annual Report.

¹ OJ L 158, 14.6.2019, p. 22.

- (3) According to Article 4(3)(b) of Regulation (EU) 2019/942, in formulating its Opinion, the Agency should take into account the objectives of non-discrimination, effective competition and the efficient and secure functioning of the internal gas market.

2. SUMMARY OF ENTSOG's ANNUAL REPORT 2018

- (4) In its Annual Report 2018, ENTSOG assesses the status of work by comparing the executed work against what was planned in its Annual Work Programme. ENTSOG has highlighted as main tasks those defined in Regulation (EC) No 715/2009, including the development and monitoring of the implementation of network codes, the development of the Ten-Year Network Development Plan (TYNDP), the provision of information on gas supply and demand, and of common operational tools to ensure network security and reliability.
- (5) The Annual Report 2018 also covers work related to the functioning of the European gas markets and to the longer term horizons (“scenarios”) of the European Union’s gas sector.
- (6) Finally, the Annual Report 2018 illustrates ENTSOG’s structure, membership (including associated members and observers), and financials.

3. ASSESSMENT OF ENTSOG's ANNUAL REPORT 2018

- (7) ENTSOG’s Annual Report 2018 generally contributes to the objectives of non-discrimination, effective competition, efficient and secure functioning of the internal gas market.
- (8) ACER is of the view that the Annual Report for 2018 shows improvements in comparison to previous annual reports, in terms of a better structure, greater detail, and clearer presentation.
- (9) However, ACER recommends that, further to improve the future annual reports, ENTSOG:
- a. Introduce in its annual reports a separate section dedicated to de-carbonisation and energy transition work and deliverables. Such a chapter should also be included in the annual work programmes;
 - b. In work related to security of gas supply, while recognising that, as a collective body of gas transmission system operators, ENTSOG focuses primarily on the ability of the system to provide gas under the assumption that gas is available, the Agency recommends that ENTSOG pays more attention on gas supply availability per se;
 - c. Provide more transparency to ACER, NRAs and other stakeholders on modelling assumptions used in scenarios;

- d. Consider implementing the recommendations provided in ACER's Opinion No 10/2019² for the cooperation with third country TSOs;
- e. Better formally document system modelling methodologies, including those used for supporting the TYNDP and PCI processes, in a way which will allow stakeholders independently to replicate the analyses based on the methodologies;
- f. Avoid overlaps and provide greater focus not just on work successfully carried out, but also on difficulties faced by ENTSOG, as well as on the solutions applied in order to overcome them,

HAS ADOPTED THIS OPINION:

- 1. ACER considers that ENTSOG's Annual Report 2018 is sufficiently in line with the requirements of Article 4(3)(b) of Regulation (EU) 2019/942.
- 2. This Opinion is addressed to ENTSOG.

Done at Ljubljana on 8 October 2019.

- SIGNED -

For the Agency
Director ad interim
Alberto POTOTSCHNIG