

# TSOs compliance with transparency requirements from Regulation (EC) No. 715/2009

Focus on North-West region

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10<sup>th</sup> Stakeholder Group meeting of GRI NW 23 November 2012



### **Outline**

- Background
- Scope of ACER analysis
- Overview of results in NW countries
  - Detailed results per requirement
  - Detailed results per country and TSO
- Main findings in the NW region
- Issues identified and examples of good practice
- Stakeholders' feedback
- Main conclusions
- Way forward



## **Background**

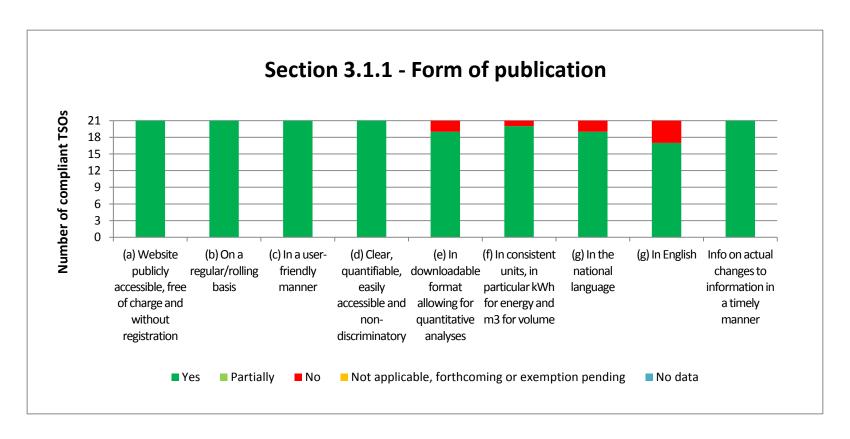
- Transparency is a vital element for well-functioning gas markets and a relevant pre-requisite for a level playing field for all network users and market actors
- In particular, a high level of transparency in system and market information is desirable in order to achieve the following goals:
  - Increase competition and remove barriers for new entrants
  - Ensure effective access to gas transmission systems
  - Provide a minimum level of information for network users and market participants that allows them to perform their activities
  - Enable market monitoring and support decision-making by national regulators and supervisory authorities
  - Allow for lower costs for market participants
  - Provide network users with the information they need in relation to specific system procedures (nomination, capacity booking, contracting services, balancing, etc.)
- In the 20<sup>th</sup> Madrid Forum, ACER announced its intention of monitoring the implementation of transparency rules pursuant to Chapter 3, Annex I of Regulation 715/2009



## Scope of ACER analysis

- The inquiry refers to the transparency obligations as established in EC Decision of 10 November 2010, applicable since 3 March 2011:
  - > Content of publication: system and services, capacity information, gas flows, etc.
  - > Scope of information published: information for certain relevant points
  - > Format of publication: accessibility, frequency, user-friendliness
- ACER presented preliminary results (based on TSOs' self-assessment) in the XXI Madrid Forum in March 2012 and the final results in the XXII Madrid Forum in October 2012
- The results presented today focus on the North-West region and include a recent update of compliance by German TSOs
- The Gas Regional Initiative has been a good instrument to help carrying out this analysis. NRAs, TSOs and other stakeholders have contributed decisively to it
- ACER full analysis covers 41 TSOs from 22 EU Member States
- This presentation covers 21 TSOs from 9 countries from the NW region

### NW region – Results per requirement (1)

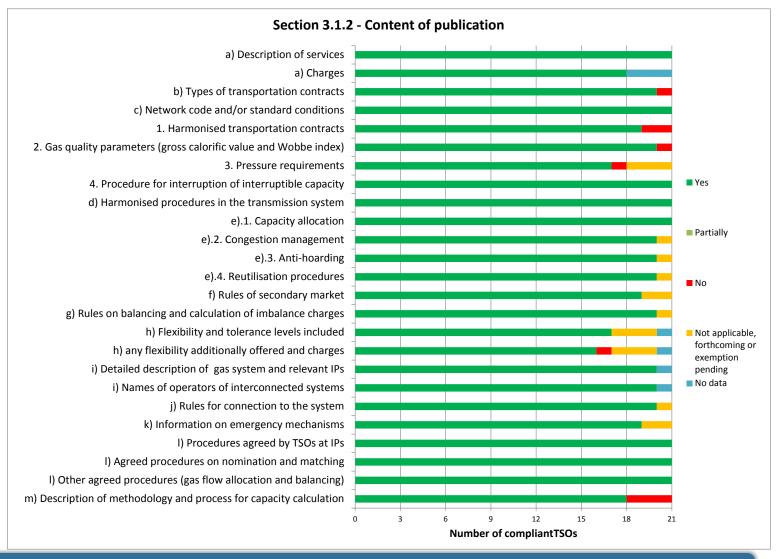


#### Notes:

- Answers where "no" does not imply non-compliance are not considered (e.g. information published by third party)
- Some results are still under revision with the concerned TSOs and NRAs (recent update for German TSOs)

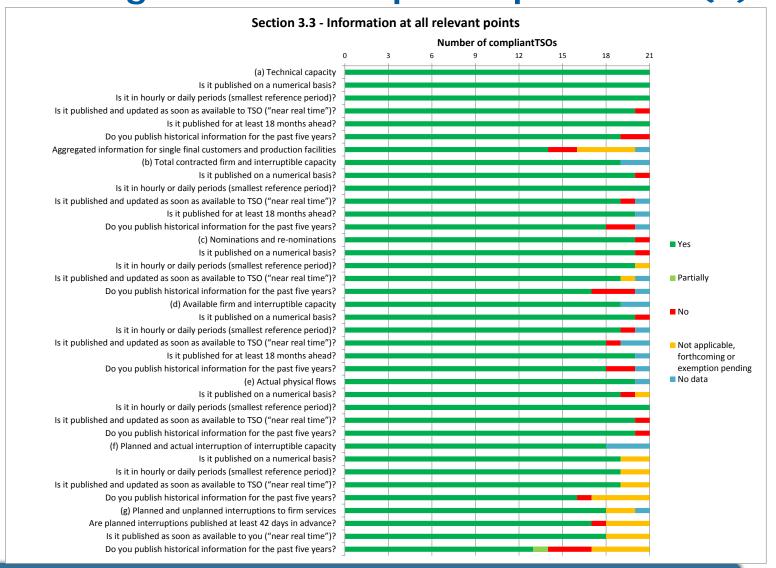


### NW region – Results per requirement (2)



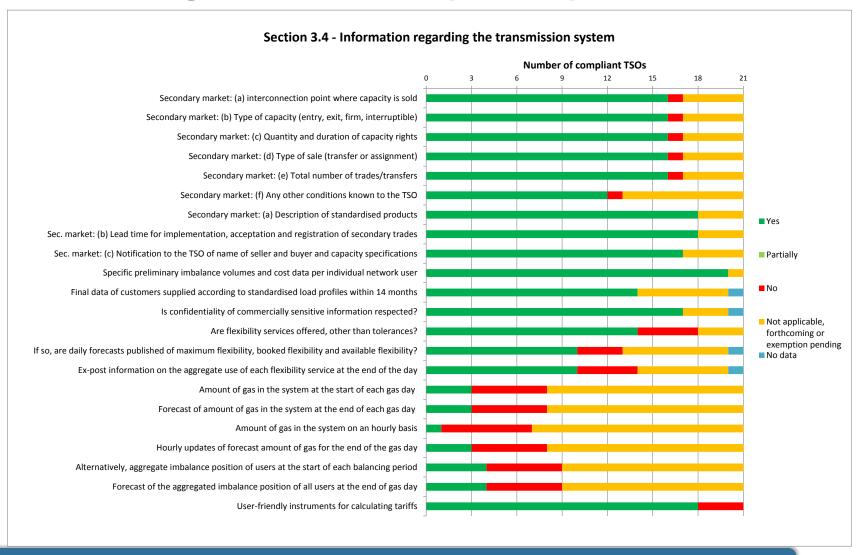


### NW region – Results per requirement (3)



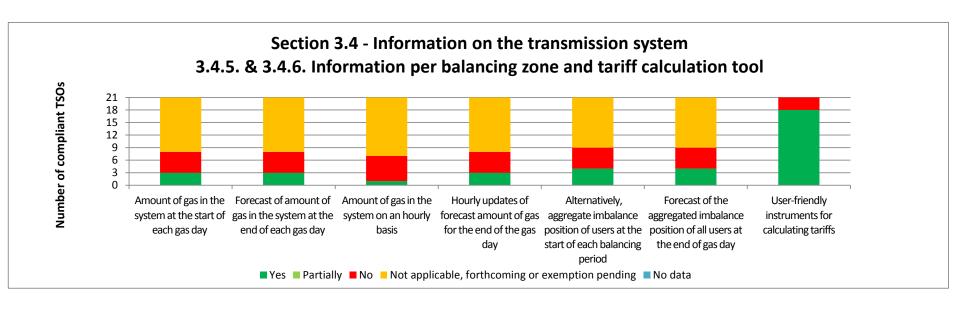


### NW region – Results per requirement (4)

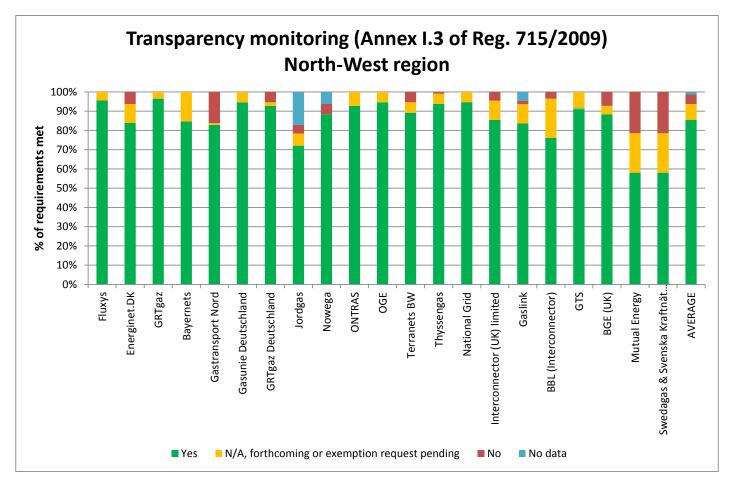




### NW region - Results per requirement (and 5)



## NW region – Results per country and TSO



#### Notes:

- Answers where "no" does not imply non-compliance are not considered (e.g. information published by third party)
- Some results are still under revision with the concerned TSOs and NRAs (recent update for German TSOs)



### **NW** region – Main findings

- **High degree of compliance**, in general, with Annex 1.3 of Regulation (EC) No 715/2009, in particular in the case of information on:
  - ✓ Description of transmission system and services
  - ✓ Network code contracts, pressure requirements, interruption procedure
  - ✓ Provisions on CAM, CMP anti-hoarding and reutilisation
  - ✓ Nomination and matching procedures
  - ✓ Balancing rules and imbalance charges
  - ✓ Rules for connection to TSOs' facilities
  - ✓ General information on technical/booked-available/firm-interruptible capacity
  - ✓ User-friendly instruments for calculating tariffs
  - ✓ Form of publication (easy access, user-friendliness, frequency of data, etc.)
- On average, about 86% of requirements met
- Good example of compliance and user-friendliness: National Grid, Gasunie
- Nine TSOs above 90%, 17 above 80%. None below 50%



### **NW** region – Main findings

- Certain lack of compliance in information about:
  - Actual physical flows, planned and actual interruptions
  - Flexibility and tolerance levels
  - Emergency mechanisms
  - Methodology, process and parameters for capacity calculation
  - Information about the secondary market (N/A in many cases)
  - Information in English in some cases
- And only some TSOs publish:
  - x Aggregate information on capacities for end customers and production facilities
  - x Historical information on capacities, nominations, interruptions, physical flows
  - x Amount of gas at the beginning of the day and forecast for the end of the day
  - x Imbalance position of users at the start and end of the day
- The results for some TSOs are still under review by ACER together with the concerned TSOs and NRAs

### Issues identified and examples of good practice

#### Some **issues** identified when assessing compliance:

- Links with restricted access (user/password) or too generic
- Compliance with some requirements is difficult to be checked (information published close to real time or as soon as becomes available to the TSO)
- Some requirements are considered as not applicable, as the information is not relevant or yet available (e.g. information on secondary market, daily capacity data when only monthly allocation is offered, etc.)
- Websites not available in English

#### Some examples of good practice:

- Publish information with the same structure than the set of requirements in Annex
   1 of Regulation 715/2009 in a section called "Transparency" in the TSO website
- When information is published by a third party (another TSO, market area manager) a direct link is provided in the TSO website



### NW region – Stakeholders feedback (1)

- Public consultation of TSOs' answers run over November 2011 January 2012
- 11 responses were received from stakeholders
- A public workshop was organised by ACER in Ljubljana on 13 September

#### **General comments**

- » Remarkable efforts have been made by TSOs. There has been significant progress
- » However, there is room for improvement. Stakeholders don't share the overall "green picture"
- » Compliance is not just a "tick-list" exercise, issues are beyond the quantitative analysis
- » TSOs await for specific guidance from NRAs to implement the requirements

#### Quality, consistency, frequency and availability of the information

- » Despite overall compliance, large variety in the quality of information
- » Multiplicity of sources and websites make it hard to find and process information
- » Quality standards and a single transparency platform supported by many stakeholders

### NW region - Stakeholders feedback (and 2)

#### Accuracy of TSOs' responses

- » The questionnaires broadly reflect the information available, but not always its quality
- » Implicit degree of subjectivity and interpretation concerning some requirements
- » Compliance with some requirements is directly related to market design

#### User-friendliness of information and free access

- » The degree of user-friendliness of the websites and platforms differs
- » Standardisation of formats would improve ease of access
- » Information is free of charge, but registration is necessary in some cases

#### Availability close to real time

- » Requirement difficult to assess, but in view of many users only a few TSOs publish data close to real time
- » Information on actual gas flows seems to be a major issue
- » Insufficient frequency of data publication in some TSO websites compared to others



### Main conclusions

- In general, there is a good level of compliance by TSOs against the transparency requirements in Section 3, Annex 1 of Regulation 715/2009
- In particular, the situation is satisfactory regarding information about the system, services provided, system procedures and general data of technical and available/booked capacities
- However, there is a certain lack of compliance in a number of areas, such as information near real time, flexibility and tolerances, planned and actual interruptions, amounts of gas at start and end of the gas day
- Different perception by NRA and stakeholders in some instances
- There are remaining issues especially as regards information near real time or as soon as available to the TSO (e.g. gas flows) and quality of information in some cases



## Way forward

- Analysis of compliance with Regulation (EC) No 715/2009 (amended by EC Decision of 10 November 2010) has revealed remaining issues that need to be tackled
- NRAs should take action to enforce compliance, by analysing these issues together with TSOs
- Conclusion 5 from XXII Madrid Forum: NRAs and EC to assess where follow-up legal action is necessary to achieve full compliance
- The recent **Commission Decision of 24 August 2012** has added new amendments to Annex I of Regulation 715/2009, introducing new guidelines on CMP as well as some further transparency obligations:
  - Downloadable format agreed by TSOs and NRAs on the basis of an opinion by ACER on a harmonised format that allows for quantitative analyses
  - All data to be available as of 1 October 2013 on a EU-wide central platform, established by ENTSOG on a cost-efficient basis
  - Further transparency obligations related to the new CMP guidelines (as of 1 October 2013)

Work on these upcoming requirements has started already or will soon do it

## For any feedback or further comment:

TransparencyGas@acer.europa.eu



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## Thank you for your attention!



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#### Annex

## Detailed results from the analysis

### Colour tables in the NW region

#### Code key:

Yes	Yes
Р	Partially
No	No
NA	Not applicable, forthcoming or exemption request pending
В	No data



	Country Code	BE	DK	DE										FR	GB	ΙE	NI		NL	SE	GB/NL	GB/B
Article of Annex 1 chapter 3 of Gas Regulation 715/2009	Transparency requirement	Fluxys	Energinet.DK	Bayernets	Gastransport Nord	Gasunie Deutschland	GRTgaz Deutschland	Jordgas	Nowega	ONTRAS	OGE	Terranets BW	Thyssengas	GRTgaz	National Grid	Gaslink	BGE (UK)	Mutual Energy	GTS	Swedagas & Svenska Kraftnat	BBL Company	Interconnector UK
3.1.1. Form o	of publication:																					
	Do you publish the information referred to under paragraph 3.1.2. in the following manner:																					
	(a) on a website accessible to the public, free of charge and without any need to register or otherwise sign on with the transmission system operator;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(b) on a regular/rolling basis; the frequency shall be according to the changes that take place and the duration of the service;	Yes	Yes			Yes		Yes		Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes	Yes		Yes
	(c) in a user-friendly manner;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.1.1.1.	(d) in a clear, quantifiable, easily accessible way and on a non- discriminatory basis;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(e) in downloadable format that allows for quantitative analyses;	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(f) in consistent units, in particular kWh (with a combustion reference temperature of 298,15 K) shall be the unit for energy content and m 3 (at 273,15 K and 1,01325 bar) shall be the unit for volume. The constant conversion factor to energy content shall be provided. In addition to the format above, publication in other units is also possible;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
	(g) in the official languages of the member State and	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes
	(g) in English	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
3.1.1.2.	Do you provide details on actual changes to all information referred to under paragraph 3.1.2 in a timely manner as soon as available to you?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
																						A۷
3.1.2 Conten	t of publication																					
3.1.2 a)	Do you publish a detailed and comprehensive description of the different services offered and	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	their charges?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	В	Yes	Yes
3.1.2 b)	Do you publish the different types of transportation contracts available for these services?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No



	Country Code	BE	DK	DE										FR	GB	ΙE	NI		NL	SE	GB/NL	GB/B
Article of Annex 1 chapter 3 of Gas Regulation 715/2009	Transparency requirement	Fluxys	Energinet.DK	Bayernets	Gastransport Nord	Gasunie Deutschland	GRTgaz Deutschland	Jordgas	Nowega	ONTRAS	OGE	Terranets BW	Thyssengas	GRTgaz	National Grid	Gaslink	BGE (UK)	Mutual Energy	GTS	Swedagas & Svenska Kraftnat	BBL Company	Interconnector UK
3.1.2 Content	of publication																					
	Do you publish the network code and/or the standard conditions outlining the rights and responsibilities of all network users including:	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Harmonised transportation contracts and other relevant documents;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No
3.1.2.c)	<ol> <li>if relevant for access to the system, for all relevant points as defined in paragraph 3.2 of this Annex, a specification of relevant gas quality parameters, including at least the gross calorific value and the Wobbe index, and the liability or costs of conversion for network users in case gas is outside these specifications;</li> </ol>	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
	if relevant for access to the system, for all relevant points information on pressure requirements;	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes	Yes	Yes	Yes	NA	No	Yes
	4. the procedure in the event of an interruption of interruptible capacity, including, where applicable, the timing, extent, and ranking of individual interruptions (for example pro-rata or first-come-last-interrupted);	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.1.2 d)	Do you publish the harmonised procedures applied when using the transmission system, including the definition of key terms?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Do you publish provisions on																					
	1. capacity allocation,	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.1.2.e)	2. congestion management,	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes
	3. anti-hoarding, and	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes
	4. reutilisation procedures?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes
3.1.2.f)	Do you publish the rules applicable for capacity trade on the secondary market vis-à-vis the transmission system operator?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes	Yes	NA	Yes	Yes
3.1.2.g)	Do you publish rules on balancing and methodology for the calculation of imbalance charges?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes



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Article of Annex 1 chapter 3 of Gas Regulation 715/2009	Transparency requirement	Fluxys	Energinet.DK	Bayernets	Gastransport Nord	Gasunie Deutschland	GRTgaz Deutschland	Jordgas	Nowega	ONTRAS	OGE	Terranets BW	Thyssengas	GRTgaz	National Grid	Gaslink	BGE (UK)	Mutual Energy	GTS	Swedagas & Svenska Kraftnat	BBL Company	Interconnector UK
3.1.2 Content	of publication																					
3.1.2.h)	If applicable, do you publish the flexibility and tolerance levels included in transportation and other services without separate charge, as well as any flexibility offered in addition to this and the corresponding	Yes	Yes	Yes	Yes		Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA Yes	NA NA	NA NA	Yes
	charges	103	103	103	103	103	103	<u>ا</u>	103	103	103	NO	103	103	INA	103	103	103	103	IVA	INA	103
3.1.2.i)	Do you publish a detailed description of the gas system of the transmission system operator and its relevant points of interconnection as defined in paragraph 3.2 of this Annex, as well as	Yes		Yes	Yes		Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	the names of the operators of the interconnected systems or facilities?  Do you publish the rules applicable for connection to the system	Yes	Yes				Yes	В	Yes	Yes	Yes		Yes		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.1.2.J)	operated by the transmission system operator?	Yes				Yes		Yes	Yes	Yes	Yes		Yes		Yes	Yes	Yes		Yes	Yes	NA	Yes
	Do you publish information on emergency mechanisms, as far as it is the responsibility of the transmission system operator, such as measures that can lead to the disconnection of customers groups and other general liability rules that apply to the transmission system operator?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA
	Do you publish																					
3.1.2.l)	procedures agreed upon by transmission system operators at interconnection points, of relevance for access of network users to the transmission systems concerned, relating to interoperability of the network,	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
5.112,	agreed procedures on nomination and matching procedures and	Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes	Yes		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	other agreed procedures that set out provisions in relation to gas flow allocations and balancing, including the methods used?	Yes				Yes			Yes					Yes			Yes	Yes	Yes	Yes	Yes	Yes
3.1.2.m)	Do you publish a detailed and comprehensive description of the methodology and process, including information on the parameters employed and the key assumptions, used to calculate the technical capacity?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes



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3.3 Informati	on to be published at all relevant points and the time schedule	acc	ording	g to v	vhich	this	infor	matic	on sh	ould	be pu	blish	ed									A۱
	Do you publish at all relevant points the following information for all services and ancillary services provided:																					
	(a) the technical capacity for flows in both directions;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Is this information published on a numerical basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Is this information in hourly or daily periods, equal to the smallest reference period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
	Is this information published for a period of at least 18 months ahead?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Do you publish historical information on the technical capacity for flows in both directions for the past five years on a rolling basis?	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
3.3.1., 3.3.2.	Is information for single final customers and for production facilities, that is excluded from the definition of relevant points as described under 3.2 (1)(a) published in aggregate format at least per balancing zone. The aggregation of single final customers and of production facilities, excluded from the definition of relevant points as described under 3.2 (1)(a), shall for the application of this annex be considered one relevant point.	Yes	Yes	Yes	No	Yes	NA	В	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	NA	Yes	Yes	NA	NA
	(b) the total contracted firm and interruptible capacity in both directions	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	В	Yes	Yes
	Is this information published on a numerical basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
	Is this information in hourly or daily periods, equal to the smallest reference period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
	Is this information published for a period of at least 18 months ahead?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Do you publish historical information on the total contracted firm and interruptible capacity for flows in both directions for the past five years on a rolling basis?	Yes	Yes	Yes	No	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes



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3.3 Informati	on to be published at all relevant points and the time schedule	acco	ording	j to v	vhich	this	infor	matic	n sh	ould	be pu	ıblish	ed									A۷
	(c) the nominations and re-nominations in both directions;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
	Is this information published on a numerical basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
	Is this information in hourly or daily periods, equal to the smallest reference period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes	Yes	Yes
	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes	Yes	Yes
	Do you publish historical information on the nominations and re- nominations in both directions for the past five years on a rolling basis?	Yes	Yes	Yes	No	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	Yes
	(d) the available firm and interruptible capacity in both directions;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	В	Yes	Yes
	Is this information published on a numerical basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
	Is this information in hourly or daily periods, equal to the smallest reference period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	No
3.3.1., 3.3.2. and 3.3.3.	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	No
	Is this information published for a period of at least 18 months ahead?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Do you publish historical information on the available firm and interruptible capacity in both directions for the past five years on a rolling basis?	Yes	Yes	Yes	No	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
	(e) actual physical flows;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes
	Is this information published on a numerical basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA	Yes	Yes
	Is this information in hourly or daily periods, equal to the smallest reference period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
	Do you publish historical information on actual physical flows for the past five years on a rolling basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes



	Country Code	BE	DK	DE										FR	GB	ΙE	NI		NL	SE	GB/NL	GB/B
Article of Annex 1 chapter 3 of Gas Regulation 715/2009	Transparency requirement	Fluxys	Energinet.DK	Bayernets	Gastransport Nord	Gasunie Deutschland	GRTgaz Deutschland	Jordgas	Nowega	ONTRAS	OGE	Terranets BW	Thyssengas	GRTgaz	National Grid	Gaslink	BGE (UK)	Mutual Energy	GTS	Swedagas & Svenska Kraftnat	BBL Company	Interconnector UK
3.3 Informati	ion to be published at all relevant points and the time schedule	_		_	_	_	_	_	_			_	_									AV
	(f) planned and actual interruption of interruptible capacity;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	В	Yes	В	Yes	Yes
	Is this information published on a numerical basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	Yes	Yes
	Is this information in hourly or daily periods, equal to the smallest reference period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	Yes	Yes
	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	Yes	Yes
	Do you publish historical information on planned and actual interruptions of interruptible capacity for the past five years on a rolling basis?	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA	NA	Yes	NA	Yes	Yes
	(g) planned and unplanned interruptions to firm services as well as the information on restoration of the firm services (in particular, maintenance of the system and the likely duration of any interruption due to maintenance).	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	В	NA	NA	Yes	Yes	Yes	Yes
	Do you publish planned interruptions at least 42 days in advance?	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA	NA	Yes	Yes	Yes	Yes
	Is this information and updates published as soon as available to you ("near real time")?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA	NA	Yes	Yes	Yes	Yes
	Do you publish historical information on planned and unplanned interruptions for the past five years on a rolling basis?	Yes	Yes	Yes	No	Yes	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA	NA	Р	No	No	Yes
	Do you publish measured values of the gross calorific value or the Wobbe index at all relevant points, on a daily basis?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	NA	Yes	Yes
	Do you publish preliminary figures at the latest 3 days following the respective gas day?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	Yes	Yes
	Do you publish final figures within 3 months after the end of the respective month?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes



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3.3 Informati	ion to be published at all relevant points and the time schedule	acco	ording	g to v	vhich	this	infor	matic	n sh	ould	be pu	blish	ed									A۱
	Do you publish for all relevant points, available capacities, booked and technical capacities, on an annual basis	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	over all years where capacity is contracted plus 1 year, and	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	В	Yes	Yes
3.3.5.	at least for the next 10 years.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	В	Yes	Yes
	Is this information updated at least every month or more frequently, if new information becomes available?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes
	Does the publication reflect the period for which capacity is offered to the market?	Yes	Yes	Yes	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	Do you publish the information referred to under paragraph 3.3(1) to 3.3(5) in the following manner:																				AVERA	GE 3.3
	(a) on a website accessible to the public, free of charge and without any need to register or otherwise sign on with the transmission system operator;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(b) on a regular/rolling basis; the frequency shall be according to the changes that take place and the duration of the service;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(c) in a user-friendly manner;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3.1.1.1.	(d) in a clear, quantifiable, easily accessible way and on a non- discriminatory basis;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(e) in downloadable format that allows for quantitative analyses;	Yes	Yes	Yes	Yes		Yes	No	No		Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes
	(f) in consistent units, in particular kWh (with a combustion reference temperature of 298,15 K) shall be the unit for energy content and m 3 (at 273,15 K and 1,01325 bar) shall be the unit for volume. The constant conversion factor to energy content shall be provided. In addition to the format above, publication in other units is also possible;	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	(g) in the official languages of the member State and	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	Yes
	(g) in English	Yes	Yes	Yes	No	Yes	Yes	No	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
3.1.1.2.	Do you provide details on actual changes to all information referred to under paragraph 3.3(1) to 3.3(5) in a timely manner as soon as available to you?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes



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Article of Annex 1 chapter 3 of Gas Regulation 715/2009	Transparency requirement	Fluxys	Energinet.DK	Bayernets	Gastransport Nord	Gasunie Deutschland	GRTgaz Deutschland	Jordgas	Nowega	ONTRAS	OGE	Terranets BW	Thyssengas	GRTgaz	National Grid	Gaslink	BGE (UK)	Mutual Energy	GTS	Swedagas & Svenska Kraftnat	BBL Company	Interconnector UK
3.4 Informati	on to be published regarding the transmission system and the	time	sche	dule	ассо	rding	to w	hich	this i	nforn	natio	n sho	uld k	e pu	blish	ed						
	Do you publish on a daily basis and updated every day the following specifications re. the aggregated amounts of capacities offered, and contracted on the secondary market (i.e. sold from one network user to another network user), where the information is available to you:																					
	(a) interconnection point where the capacity is sold;	Yes	No	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
	(b) type of capacity, i.e. entry, exit, firm, interruptible;	Yes	No	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
3.4.1.	(c) quantity and duration of the capacity usage rights;	Yes	No	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
	(d) type of sale, e.g. transfer or assignment;	Yes	No	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
	(e) the total number of trades/transfers;	Yes	No	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
	(f) any other conditions known to the transmission system operator as mentioned in 3.3.	NA	No	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA	Yes	Yes	NA	NA	NA	NA	Yes
	Is this information provided by a third party?																					
	Do you publish the following specifications re. harmonised conditions under which capacity transactions (e.g. transfers and assignments) will be accepted:																					
	(a) a description of standardised products which can be sold on the secondary market;	Yes	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	Yes	Yes
3.4.2.	(b) lead time for the implementation/acceptation/registration of secondary trades. In case of delays the reasons have to be published;	Yes	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	Yes	Yes
	(c) the notification to the transmission system operator by the seller or the third party as referred to under 3.4(1) about name of seller and buyer and capacity specifications as outlined in 3.4(1).	Yes	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA	Yes
	Is this information provided by a third party?																					



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3.4 Informati	ion to be published regarding the transmission system and the	time	sche	dule	acco	rding	to w	hich	this i	nforr	natio	n sho	uld b	e pu	blish	ed						
	Regarding the balancing service of your system, do you provide to each network user, for each balancing period, its specific preliminary imbalance volumes and cost data per individual network user, at the latest 1 month after the end of the balancing period?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA
3.4.3.	Do you provide final data of customers supplied according to standardised load profiles within 14 months later?	Yes	Yes	NA	NA	Yes	NA	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	NA	NA
	Do you respect confidentiality of commercially sensitive information while providing this information?	Yes	Yes	NA	Yes	Yes	Yes	В	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	NA
	Is this information provided by a third party?																					
	Do you offer flexibility services, other than tolerances, for third party access?	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	NA	Yes	No	Yes	Yes	NA	Yes	Yes	Yes	Yes	No	No	NA
3.4.4.	If you do, do you publish daily forecasts on a day-ahead basis of the maximum amount of flexibility, the booked level of flexibility and the availability of flexibility for the market for the next gas day?	Yes	NA	Yes	No	Yes	Yes	В	Yes	NA	Yes	No	Yes	NA	NA	Yes	Yes	No	NA	Yes	NA	NA
	Do you also publish ex-post information on the aggregate utilisation of every flexibility service at the end of each gas day?	Yes	NA	Yes	No	Yes	Yes	В	Yes	Yes	Yes	No	Yes	NA	NA	Yes	Yes	No	NA	No	NA	NA
	(5) Do you publish, per balancing zone:																					
	the amount of gas in the transmission system at the start of each gas day and	NA	NA	NA	No	NA	No	NA	NA	NA	NA	NA	NA	Yes	Yes	NA	No	No	NA	No	NA	Yes
	the forecast of the amount of gas in the transmission system at the end of each gas day?	NA	NA	NA	No	NA	No	NA	NA	NA	NA	NA	NA	Yes	Yes	NA	No	No	NA	No	NA	Yes
	Do you publish the amount of gas in the transmission system on an hourly basis?	NA	NA	NA	No	NA	No	NA	NA	NA	NA	NA	NA	Yes	NA	NA	No	No	NA	No	NA	No
3.4.5.	Do you update the forecast amount of gas for the end of the gas day on an hourly basis throughout the gas day?	NA	NA	NA	No	NA	No	NA	NA	NA	NA	NA	NA	Yes	Yes	NA	No	No	NA	No	NA	Yes
	Alternatively, do you publish, per balancing zone																					
	the aggregate imbalance position of all users at the start of each balancing period and	Yes	NA	NA	No	NA	No	NA	NA	NA	NA	NA	NA	Yes	Yes	NA	No	No	Yes	No	NA	NA
	the forecast of the aggregated imbalance position of all users at the end of each gas day?	Yes	NA	NA	No	NA	No	NA	NA	NA	NA	NA	NA	Yes	Yes	NA	No	No	Yes	No	NA	NA
3.4.6.	Do you provide user-friendly instruments for calculating tariffs?	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	No	Yes