

GIE response to ACER's public consultation on ACER 2013 Work Programme

1. Introduction

GIE welcomes ACER's consultation of its 2013 Work Programme. GIE is glad to contribute to this public consultation with its views.

2. 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 70 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

3. General statements

- a. GIE considers that additional clarification and clear definition of roles and responsibilities between ACER and CEER would be desirable. The current situation where sometimes ACER and CEER are represented by the same person in public events or where CEER speaks about topics which, in principle, are only responsibility of ACER (or vice-versa), might generate a substantial level of confusion among market stakeholders. GIE would also suggest that ACER and CEER should better align the working plans for tasks related with each other. (e.g. CEER's discussions on incremental capacity procedures and the tariffs issues for incremental capacity in the Framework Guideline for Tariff)
- b. The Annual Work Programme for both ACER and CEER seems acceptable for GIE. As regards the increase of ACER budget/staff, it would be very much appreciated to have a deeper explanation and justification in order to better support this decision.
- c. Aspects of ACER's timetable for REMIT might be ambitious. It has to be carefully assessed whether ACER may start tendering for IT suppliers before the scope of and important issues regarding data collection have been resolved. Further, ACER should take into consideration its resource constraints when developing its data collection programme to ensure that it can feasibly manage and maintain the volume of information they are expecting to receive. Otherwise, the data collection programme will simply result in an unnecessary burden on business with no benefit to end consumers.
- d. Finally, GIE notes that it would be a very positive step for ACER to publish an evaluation report (maybe within the Annual report 2013) presenting the initial approved 2013 work programme and showing which elements of the work program have been really achieved (or not) during the year.