

RESPONSE TO GTE+ FIRST CONSULTATION DOCUMENT

1. Eurogas welcomes the initiative of GTE+ in issuing a first consultation document, with the aim of determining stakeholder views on the objectives and priorities to be pursued in preparing for the implementation of the Third Package. Eurogas has responded to the questions listed in the Annex to the Consultation document, but wishes to recall its principal position on the needed framework for GTE+'s/eventually ENTSOG's work.
 - ENTSOG will act within the scope of its role as envisaged by the Third Package. It will not engage in activities that are incompatible with this role.
 - ENTSOG has to show that its role and activities are distinct from any future TSO representational body. ENTSOG should be a neutral public entity, using the knowledge of the TSOs, but taking into account the viewpoints and needs of all stakeholders.
 - ENTSOG will operate under the oversight of the Agency, in drawing up rule and codes. Eurogas supports the proposal that the Agency should initiate the work on technical rules and codes by preparing in consultation with system users strategic or framework guidelines (Eurogas will comment separately on what these should look like) and oversee the output, having the role to approve any proposed rules or codes, which may then be made binding by the Commission.
 - ENTSOG should ensure direct regular consultation with system users throughout the process, as well as with Associations. The rules for consultation should be developed separately from the statutes of ENTSOG.
 - The process has to be transparent and yield timely results.
 - The Agency should also have an effective oversight of ENTSOG's 10 year and interim investment planning statement, to ensure that such plans go some way towards reflecting a European dimension and regional integration. System users should be consulted on the development of the 10 year plan, and the Agency should have to approve it.
 - The 10 year investment plan should include interconnection capacity objectives after consultation with users. ENTSOG should identify priority interconnection projects.
 - The Winter Outlook and other tasks of the ENTSOG should also involve consultation of users.