



***Transparency of gas transmission  
system operators in the Energy  
Community Contracting Parties***

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- ECRB Gas Working Group – part of ACER GRI SSE as of 2015
- ACER GRI SSE Work Program 2015-2018 included preparation of a status report on transmission system operators' compliance with 3<sup>rd</sup> Package transparency requirements in the Energy Community Contracting Parties.
- Beside TSO transparency, as covered by Regulation 715, also the fulfillment of transparency related provisions of Directive 2009/73 investigated.
- Data collected from NRAs via questionnaire, **reporting period is 2015, CPs covered are** Bosnia and Herzegovina (Republika Srpska entity), FYR of Macedonia, Moldova, Serbia and Ukraine.
- Report approved in March 2016.

# Some findings (1)

Relevant Art. Of Regulation 715/20090	Short description of information that has to be published	Body responsible for publishing	Bosnia and Herzegovina	FYR of Macedonia	Moldova	Serbia	Ukraine
Article 16 (2) Principles of CAM and CMP concerning TSOs	Capacity allocation mechanisms	TSO	√	√	x	√	√
Article 16 (3) Principles of CAM and CMP concerning TSOs	Congestion management procedures	TSO	√	√	x	√	√
Article 18(1) Transparency requirements concerning TSOs	Detailed info. regarding services offered and the relevant conditions applied, technical information necessary for network users to gain effective network access	TSO	√	√	x	√	√
Article 18(2) Transparency requirements concerning TSOs	Reasonably and sufficiently detailed information on tariff derivation, methodology and structure	TSO or NRA	√	√	x	√	√

## Some findings (2)

Relevant Art. Of Regulation 715/20090	Short description of information that has to be published	Body responsible for publishing	Bosnia and Herzegovina	FYR of Macedonia	Moldova	Serbia	Ukraine
Article 18(3) Transparency requirements concerning TSOs	Info. on technical, contracted and available capacities on a numerical basis for all relevant points including e/e points on a regular and rolling basis, in a user- friendly and standardized manner	TSO	X	X	X	X	√ (but only for interconnection points)
Article 18(6) Transparency requirements concerning TSOs	Ex- ante and ex- post supply and demand information, based on nominations, forecasts and realized flows in and out of the system	TSO	X	X	X	X	X
Article 18(7) Transparency requirements concerning TSOs	Measures taken as well as costs incurred and revenue generated to balance the system	TSO	X	X	X	X	√
Article 21(2) Balancing rules and imbalance charges	Calculation methodology for imbalance charges as well as final tariffs	TSO or other competent authority	X	√ (calculation methodology)	X	√ (calculation methodology)	√ (calculation methodology)

The transparency findings refer to the entity Republika Srpska and the relevant transmission system operator “Gas Promet”.

Required information is currently **published** in accordance with methodology for calculation of transmission charges and transmission network code:

- procedures for connection,
- tariff methodology and applicable tariffs,
- capacity allocation mechanism and congestion management procedures,
- information on services offered by the transmission system operator as well as technical information necessary for access to the network,
- most of the technical information necessary for network users to gain effective access to the system, for all relevant points (technical capacity for flows in both directions, contracted firm and interruptible capacity, nomination and re-nomination, available capacity, actual physical flows), however **not** the relevant historical information.

The information that is still **not published** by the transmission system operator:

- planned interruptions of firm and interruptible capacity,
- measured values of the gross calorific value or the Wobbe index
- information regarding the transmission system (ref. **Art. 3.4 of Annex I** of the Regulation 715/2009).

Required information is currently **published** in accordance with methodology for calculation of transmission charges, gas market rules and the transmission network code and relates to:

- tariff methodology and applicable tariffs,
- capacity allocation mechanism and congestion management procedures.

**However the transmission system operator currently does not publish information as required by Annex I of the Regulation 715/2009.**

Based on the Regulation on supply and use of natural gas, technical norms for transport networks of natural gas, only **procedures and tariffs for connection** are **published**. Also the applicable transmission and distribution **tariff methodologies** and the resulting **tariffs** are **published**.

**Information required for access to the transmission network is not published.**

Majority of the requirements of Directive 73/2009 and Regulation 715/2009 related to transparency of the transmission system operators have been fulfilled by publishing the transmission network codes. However there is still **missing information** on capacities offered, ex-ante and ex-post supply and demand situation, balancing measures and revenues. Network codes require such publications, however TSO unbundling process has not been finalized i.e. activities for which transparency is required are not yet performed.

The **regulatory authority publishes** all information on transmission **tariffs and methodology** for their calculation.

**Transparency requirements of Annex I of Regulation 715/2009 are only partly fulfilled** i.e. actual publications should be provided after the unbundling is finalized and the transparency platform is established.



Majority of the requirements of Directive 73/2009 and Regulation 715/2009 related to transparency of the transmission system operators have been fulfilled. The information that is still **missing** is related to balancing measures and revenues and ex-ante and ex-post supply and demand situation.

**Transparency requirements of Annex I of Regulation 715/2009 are partly fulfilled** and the **published information** is related to:

- most of the technical information necessary for network users to gain effective access to the system, for all relevant points (technical capacity for flows in both directions, contracted firm capacity, available capacity, actual physical flows), however not the relevant historical information.

Information on actual physical flows on interconnection points is published regularly on ENTSOG Transparency Platform.

Information required by **Art. 3.4 of Annex I** of the Regulation 715/2009 is still **not published** by the transmission system operator.

The background is a glowing blue globe with a grid of latitude and longitude lines. Overlaid on the globe is a complex network of bright blue lines and circular nodes, representing a global energy or communication network.

*Thank you  
for your attention!*

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