



***Unbundling of gas DSOs in the Energy
Community: Analysis of Questionnaire***

8th meeting of ECDSO-g Coordination Platform
Energy Community Secretariat, Vienna, 28 November 2019

Unbundling of gas DSOs

⇒ Directive 2009/73/EC*

Legal unbundling
Art. 26(1)

Functional unbundling
Art. 26(1), (2)

Accounting unbundling
Art. 31

Information unbundling
Art. 27

Monitoring
-
Art. 26(3), 41(1)(b) et al.

Identity separation -
Art. 26(3)

Allowed derogation – Art. 26(4) Dir. 2009/73/EC

De minimis threshold for exemption from **Art. 26** of Dir. 2009/73/EC:

DSOs with less than 100.000 connected customers

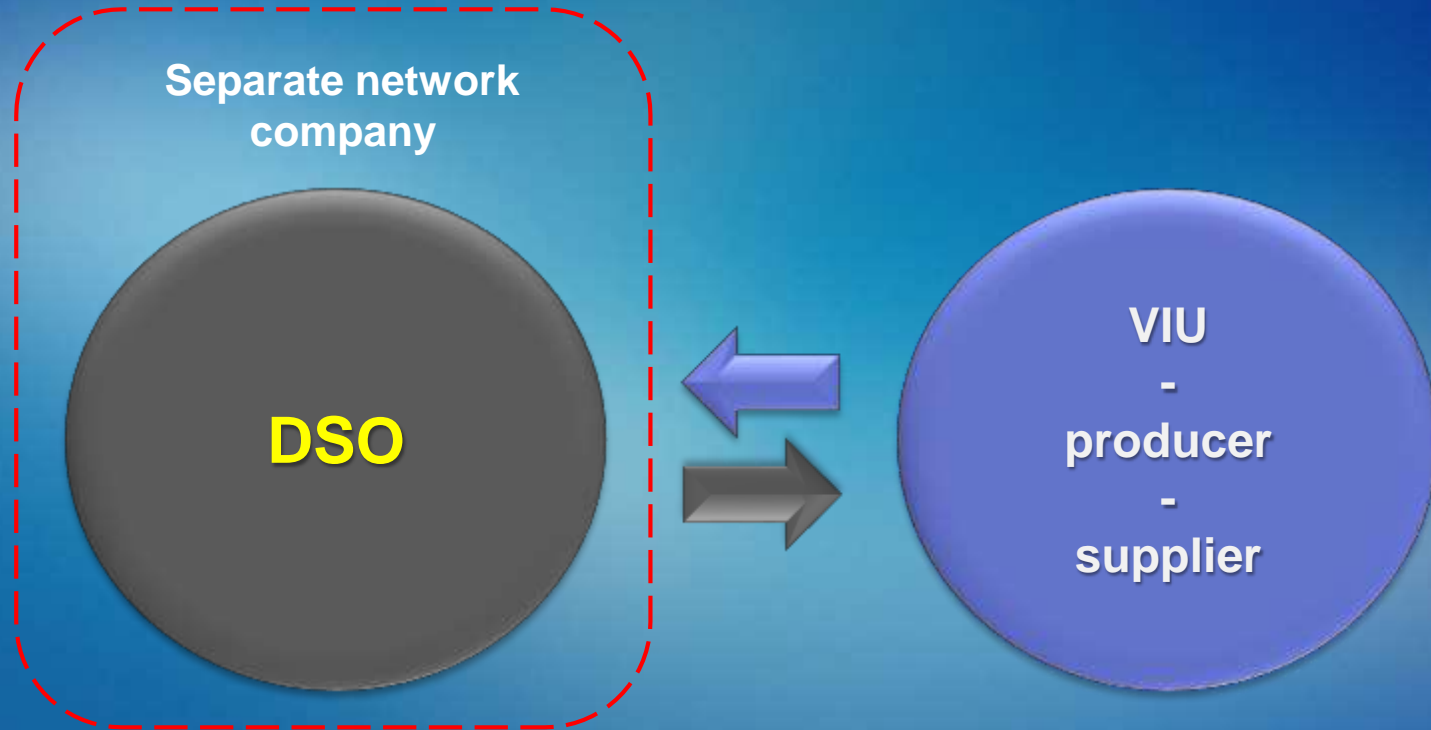
* Only 189 out of 2.400 DSOs (electricity & gas) in Europe exceed the threshold

Source: CEER Conclusion Paper, The Future Role of DSOs, 13 July 2015

#1 Legal & functional unbundling



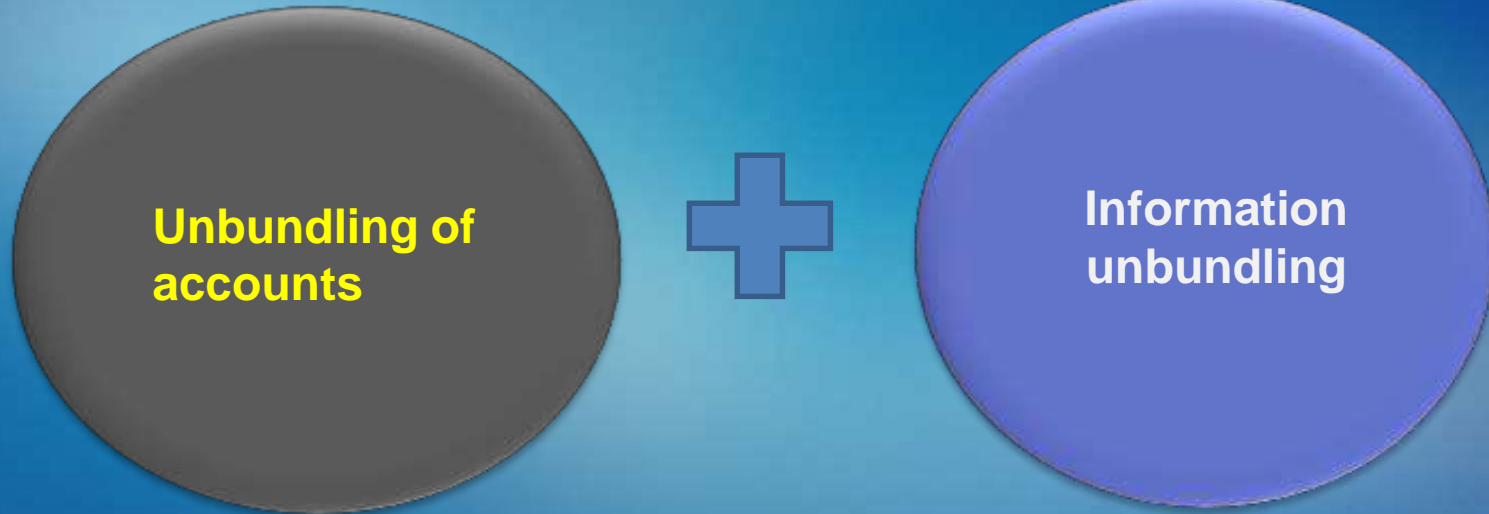
Legal unbundling



Functional unbundling



Other unbundling criteria



#2 Gas DSOs in Contracting Parties





Albania

Licensed
gas DSOs

1

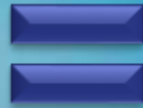
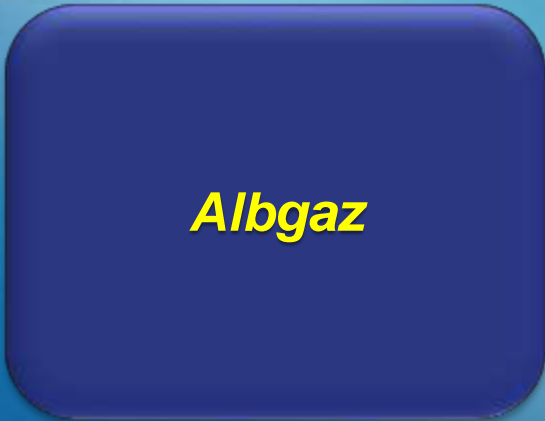


Mandatory
unbundling

1*



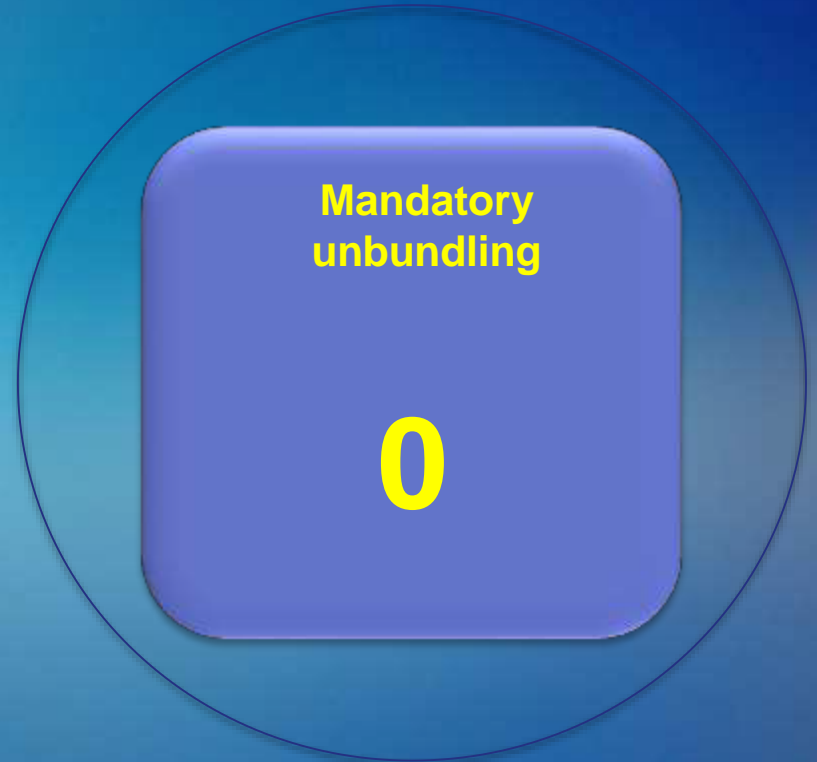
Albania



- TEP rules transposed
- DSO below threshold
- combined gas TSO & DSO
- certified as OU TSO



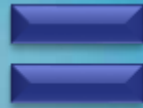
Bosnia and Herzegovina





Bosnia and Herzegovina

Gas DSOs



- TEP rules transposed in RS
- SEP rules apply in FBiH
- all DSOs below threshold
- engaged in gas supply



North Macedonia

Licensed
gas DSOs

3



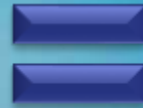
Mandatory
unbundling

0



North Macedonia

Gas DSOs



- TEP transposition in progress
- SEP rules apply
- all DSOs below threshold
- engaged in gas supply



Serbia

Licensed
gas DSOs

33



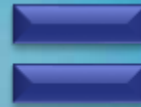
Mandatory
unbundling

0*



Serbia

Gas DSOs



- TEP rules transposed
- all DSOs below threshold
- engaged in gas supply
- unbundling of accounts reported
- Srbijagas case: >90k of customers

The infographic consists of three dark blue circles of decreasing size from left to right, set against a blue gradient background. Each circle contains text in yellow and white. The largest circle on the left represents Ukraine with 31 DSOs. The middle circle represents Georgia* with 3 DSOs. The smallest circle on the right represents Moldova with 1 DSO.

Ukraine

31 DSO

Georgia*

3 DSOs

Moldova

1 DSO

ECDSO-g – TF Unbundling

2017-2018: questionnaire regarding the unbundling of gas DSOs
collection of information covering all unbundling criteria

Ukraine

23 responses

Georgia

1 response

Moldova

1 response



Georgia

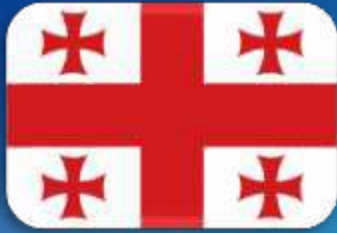
Licensed
gas DSOs

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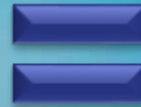


Mandatory
unbundling*

3



Georgia



- no legal basis for unbundling
 - TEP transposition in progress
 - deadline: 31 Dec. 2020
- no legal/functional unbundling
- engaged in gas supply

Pilot ECS's questionnaire sent to



Fully integrated
distribution &
supply undertaking

No unbundling: *de jure & de facto*

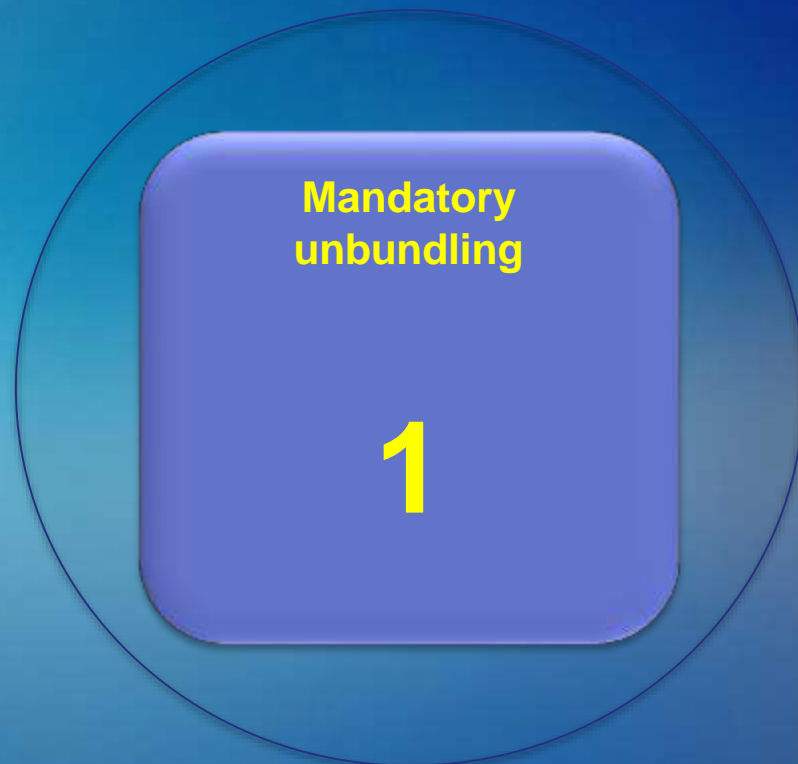
Supply is considered as part of
the DSOs activities

DSO

supplier



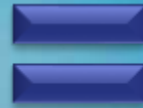
Moldova





Moldova

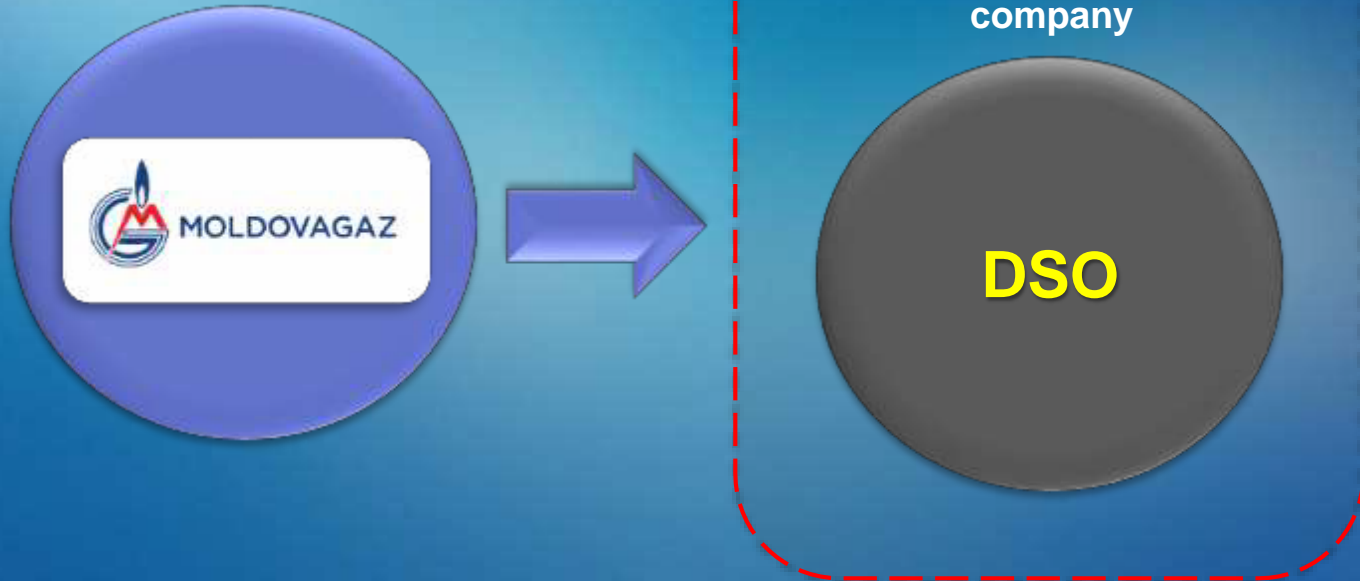
Chisinau-gaz



- TEP rules transposed
- the only DSO above threshold
- unbundling data provided to ECS
- not engaged in gas supply

Chișinău - Gaz

Legal unbundling



Functional unbundling



Separate organizational structure & CEO

Management separation

Separate internal policies (e.g. HR, remuneration, etc.)

Independent performance

De facto functional & financial independence of managers

DSO's functions concentrated within the network company

Decision-making rights

Ownership of the network & other resources

Necessary resources

No common services reported

Common services

Other unbundling criteria



Adoption of the CP confirmed

Compliance programme

Unbundling of accounts stated

Unbundling of accounts

Information unbundling, incl. confidentiality, stated

Information unbundling

Direct CEO's accountability before *Moldovagaz*

Identity separation (branding, premises & communication) stated

Identity separation



Ukraine

**Licensed
gas DSOs**

44



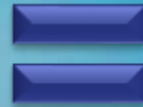
**Mandatory
unbundling**

31



Ukraine

31 DSO for unbundling



- TEP rules transposed
- unbundling in focus (NEURC)
- unbundling data being collected
- tbc on case-by-case basis

Functional unbundling



Other unbundling criteria



Adoption of CPs confirmed
(except for 1 DSO)

Compliance programme

Not all DSOs have CPs adopted:
NEURC's proceedings

Unbundling of accounts stated

Unbundling of accounts

Legal basis and procedural requirements

Information unbundling, incl. confidentiality, stated

Information unbundling

Disclosure of data – regulated and monitored

Identity separation branding, premises & communication stated

Identity separation

Cases with identical branding; cases without stipulated answers

#3 Way forward



Finalisation of the report

Communication with Regulators

Communication with DSOs

Compliance officers network



***Thank you
for your
attention!***

www.energy-community.org