



***Unbundling of gas DSOs in the Energy Community:
status quo & steps forward***

*Andrius Šimkus | Energy Community Secretariat
Gas Distribution Workshop: measurement & unbundling in focus
Vienna, 26 April 2018*

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.

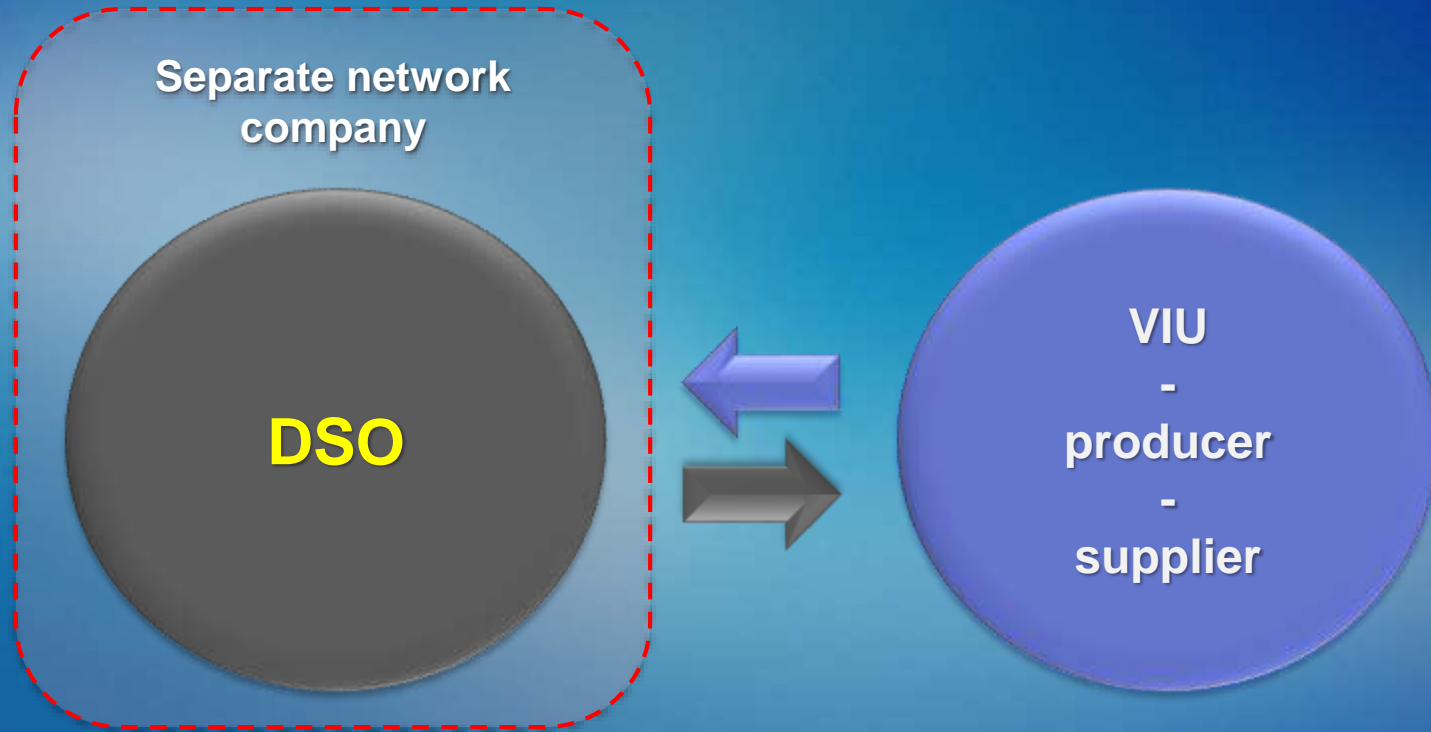
Identity separation

-
Art. 26(3)

#1 Legal & functional unbundling



Legal unbundling



Functional unbundling



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

#2 Gas DSOs in Contracting Parties



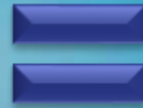


Albania





Albania



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



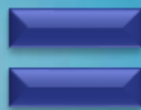
Bosnia and Herzegovina



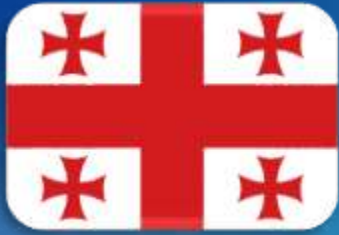


Bosnia and Herzegovina

Gas DSOs



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



Georgia

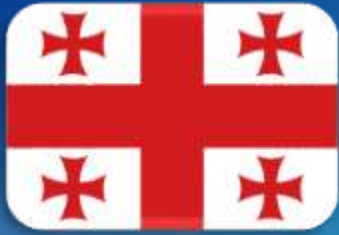
Licensed
gas DSOs

39



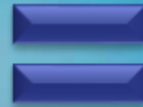
Mandatory
unbundling*

3



Georgia

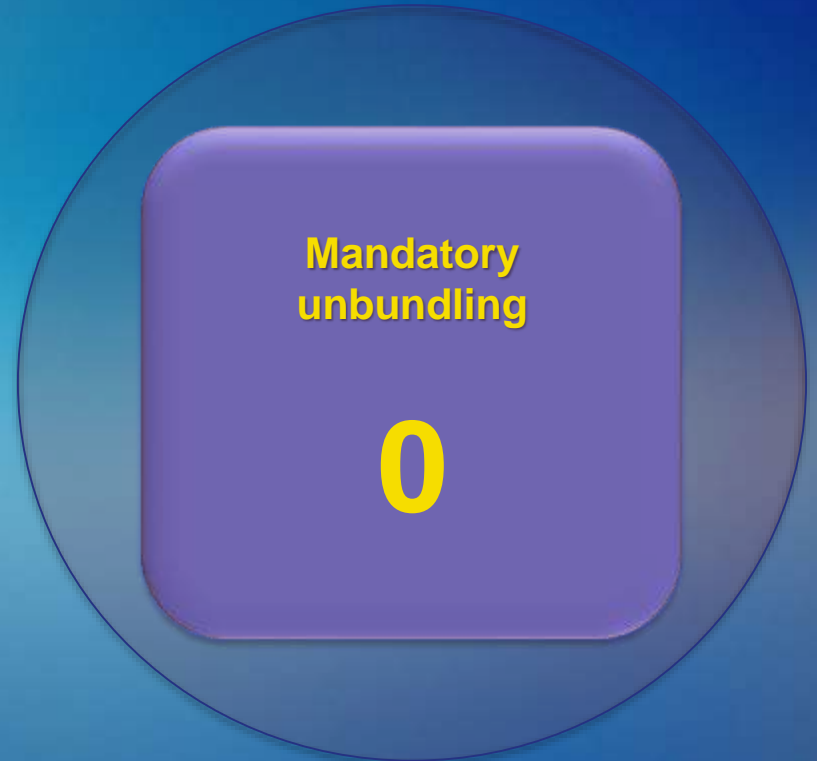
Socar
KazTransGaz
Sakorgagazi



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



FYR of Macedonia





FYR of Macedonia

Gas DSOs



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



Moldova

Licensed
gas DSOs

25



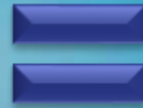
Mandatory
unbundling

1



Moldova

Chisinau-gaz



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



Serbia

**Licensed
gas DSOs**

33



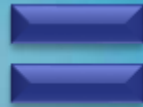
**Mandatory
unbundling**

0*



Serbia

Gas DSOs



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



Ukraine

Licensed
gas DSOs

44



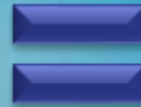
Mandatory
unbundling

31



Ukraine

31 DSO for unbundling



- TEP rules transposed
- unbundling in focus (NEURC)
- unbundling data being collected
- tbc on case-by-case basis
- **the issue:** direct interest in supply

#3 ECS focus on unbundling



**Transposition
of TEP
unbundling
rules**

**Secondary
legislation for
unbundling of
DSOs**

**Unbundling &
verification by
NRA**

**Compliance
review by ECS**

**Assistance
and/or legal
measures**

The infographic consists of three dark blue circles of decreasing size from left to right, arranged on 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: questionnaire regarding the unbundling of gas DSOs
-
collection of information covering all unbundling criteria

Ukraine

19 (+1) responses

Georgia

1 response

Moldova

1 response

#3.1 Ukraine



19 DSOs responded to the ECS's questionnaire



РЕГІОНАЛЬНА
ГАЗОВА КОМПАНІЯ
ВІННИЦЯГАЗ



РЕГІОНАЛЬНА
ГАЗОВА КОМПАНІЯ
ВОЛИНЬГАЗ



РЕГІОНАЛЬНА
ГАЗОВА КОМПАНІЯ
ДНІПРОГАЗ



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ДНІПРОПЕТРОВСЬКАГАЗ



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ЖИТОМИРГАЗ



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ЗАКАРПАТГАЗ



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ГАЗОВА КОМПАНІЯ
ЗАПОРІЖГАЗ



РЕГІОНАЛЬНА
ГАЗОВА КОМПАНІЯ
ІВАНО-ФРАНКІВСЬКАГАЗ



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КИЇВОБЛГАЗ



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КРИВОРІЖГАЗ



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МИКОЛАЇВГАЗ



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СУМИГАЗ



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ХАРКІВМІСЬКАГАЗ



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ХМЕЛЬНИЦЬКАГАЗ

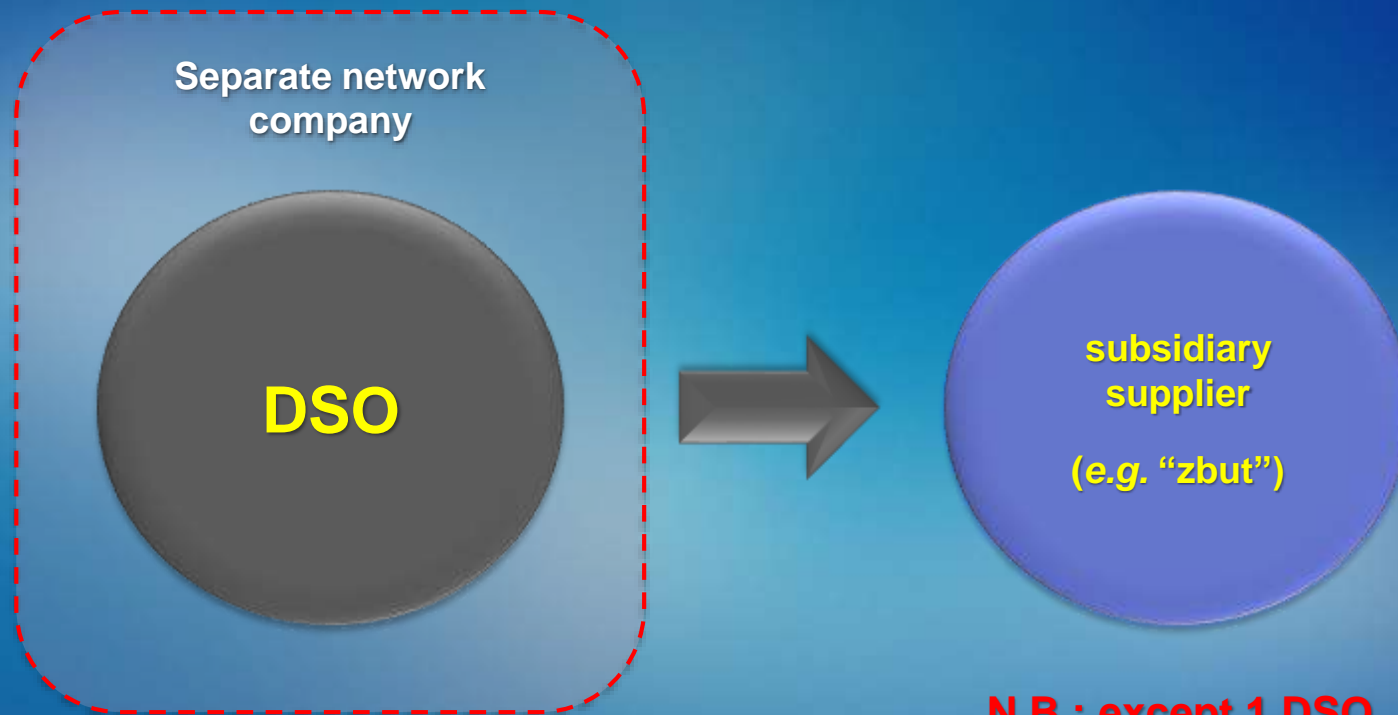


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ГАЗОВА КОМПАНІЯ
ЧЕРНІВЦІГАЗ



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ЧЕРНІВГАЗ

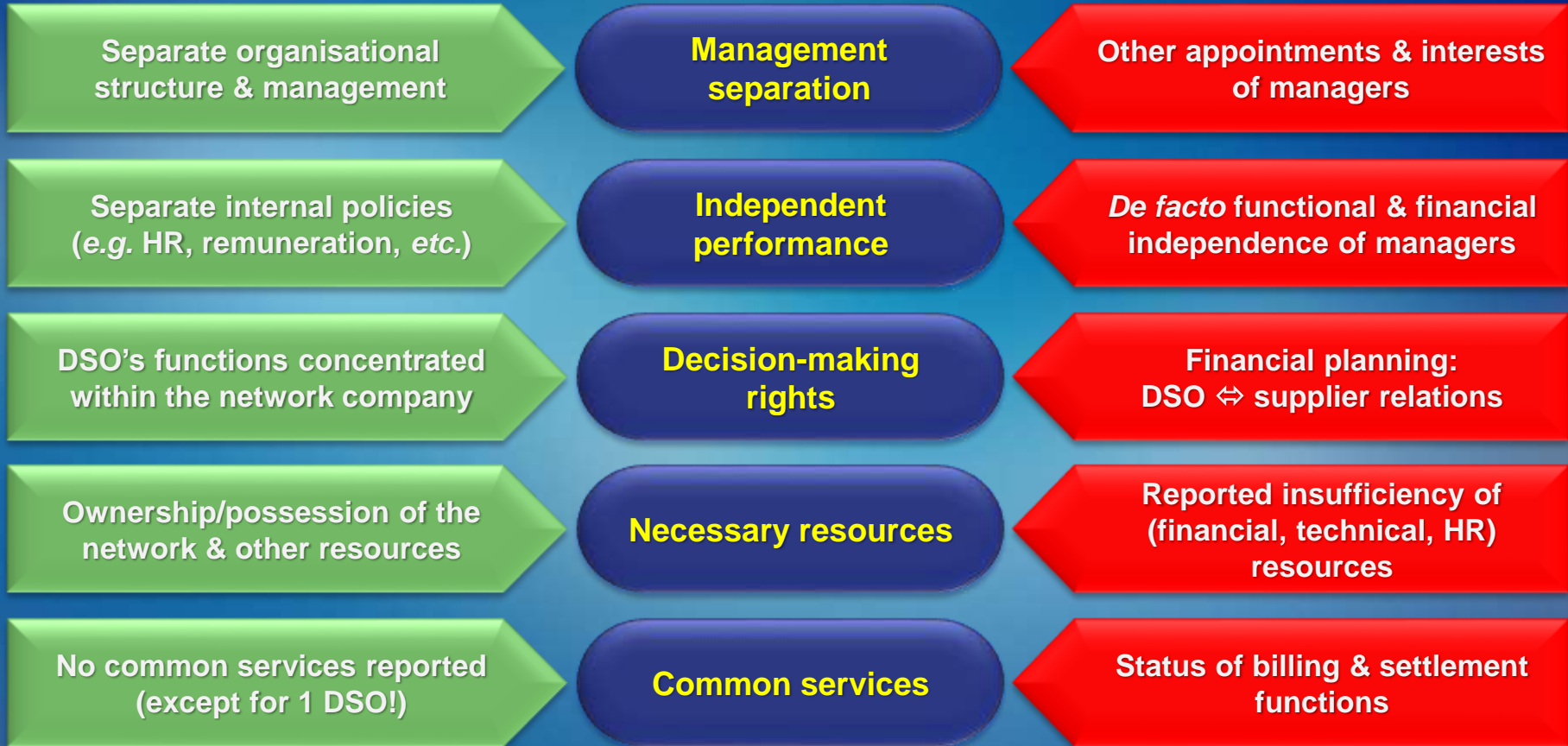
Legal unbundling



N.B.: except 1 DSO

ДОНЕЦЬКОБЛГАЗ 

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**

Information unbundling, incl.
confidentiality, stated

**Information
unbundling**

DSO representation in
subsidiary suppliers

Identity separation
(branding, premises &
communication) stated

Identity separation

Express linking with subsidiary
suppliers

Steps forward: 2018

Reporting by remaining DSOs (questionnaire)

Information request from NEURC

Addressing individual DSO cases

Proposed solutions to DSOs & NEURC (and/or legal measures)

#3.2 Georgia



Pilot ECS's questionnaire sent to



Fully integrated
distribution & supply
undertaking

No unbundling: *de jure & de facto*

DSO

Supply is considered as part of
the DSOs activities

supplier

Same pattern in other
2 DSOs

Steps forward: 2018+

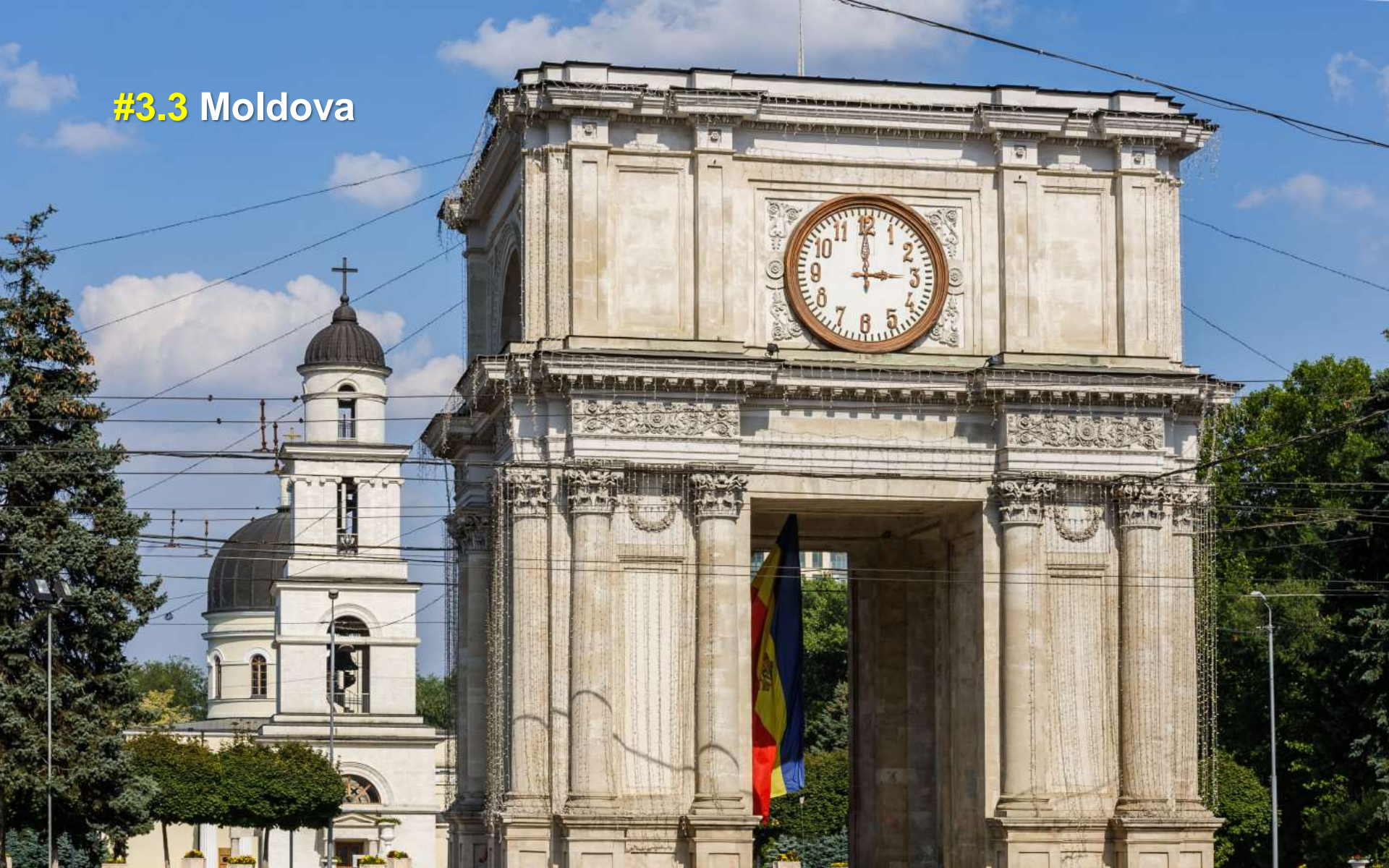


Finalisation of
primary &
secondary
legislation

Assistance in the
unbundling
process to
GNERC & DSOs

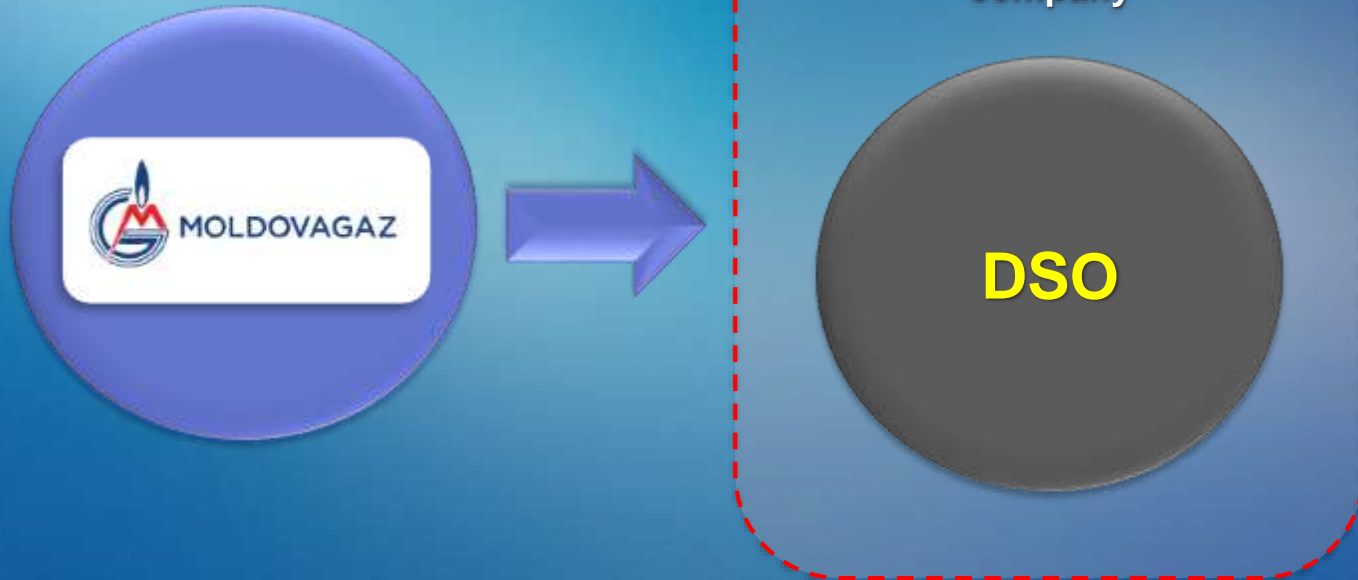
Conclusion of
the results at the
end of 2020

#3.3 Moldova

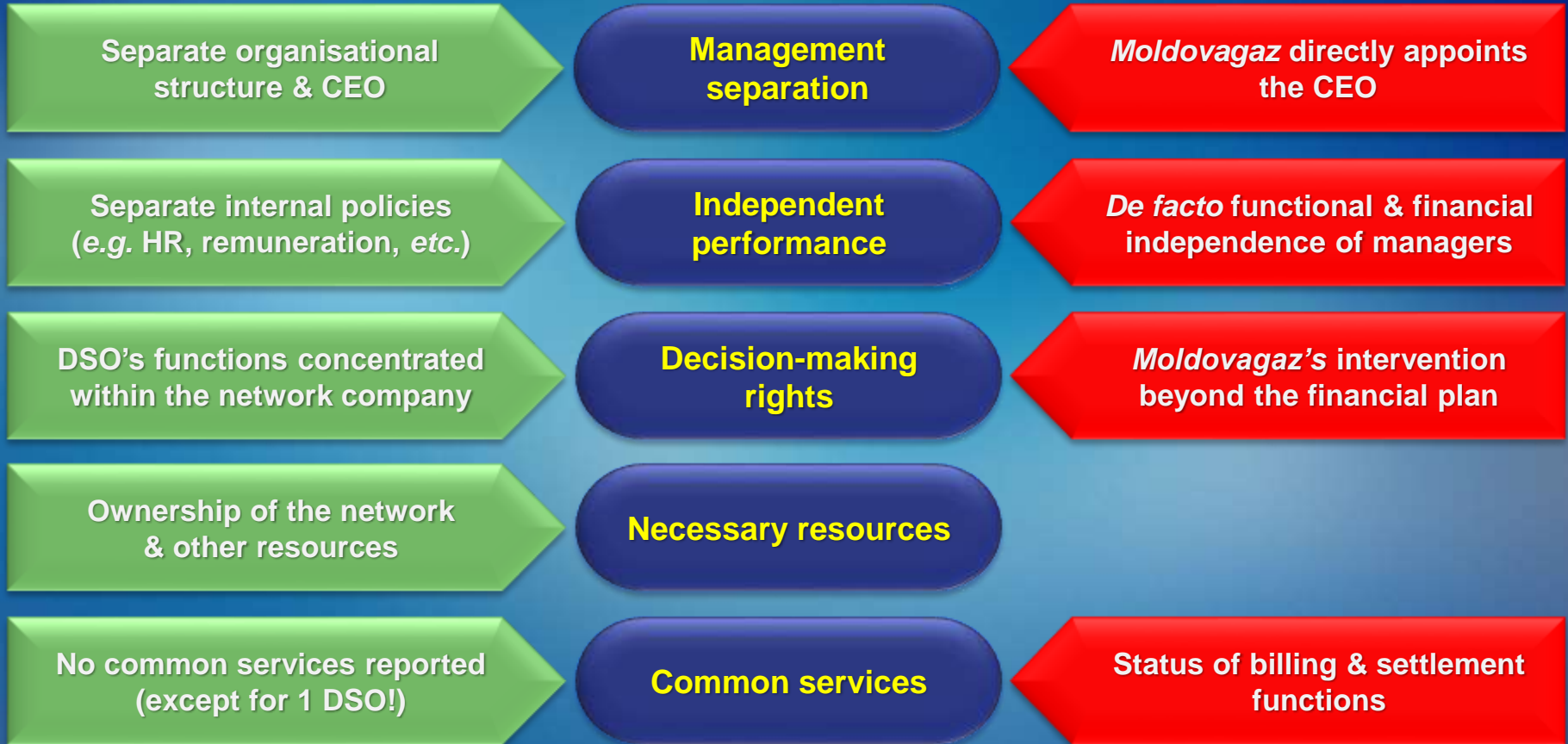


Chișinău - Gaz

Legal unbundling



Functional unbundling



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

**Identity separation
(branding)**



SRL "Chișinău-Gaz"
MOLDOVAGAZ



Chișinău-Gaz

Steps forward: 2018

Information
request from
ANRE

Necessary
clarification with
Chisinau-gaz

Proposed
solutions
(and/or legal
measures)

#4 Post scriptum







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

www.energy-community.org