

## Report on the unbundling of Gas DSOs 9th ECDSO-g Coordination Platform

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## Introduction



- The Gas Directive establishes the obligation for legal unbundling for DSOs with more than 100.000 customers connected to their system.
- Not all DSOs in our Contracting Parties are obliged to be unbundled.
- In Ukraine 31 DSOs, in Georgia 3 DSOs and in Moldova 1 DSO are having more than 100.000 customers and are covered by this obligation.
- Within the framework of the "Energy Community DSO Gas Coordination Platform", the Energy Community Secretariat has provided questionnaires regarding the unbundling of DSOs for natural gas.
- The Report, will analyze the obtained replies to such questionnaires from 25 DSOs (23 Ukraine, 1 Georgia and 1 Moldova)





- The first part is a short legal introduction of the applicable legal framework.
- The second part summarizes and aggregates all answers provided by our assessed 25 DSOs.
- The third part is analyzing in detail the unbundling situation of LLC Chisinau-Gaz (CG) from Moldova, KazTransGaz (KTG) from Georgia and the situation of 23 Ukrainian DSOs in an aggregated format.
- The last part provides recommendations based on the findings and analysis made in this report.



- The questionnaires were structured in 7 main topics:
  - general information
  - obligation to unbundle
  - legal unbundling
  - functional unbundling
  - unbundling of accounts
  - information unbundling
- Each topic provided several questions to be answered. In sum the questionnaire had 74 questions.
- This report shall provide an overview of the responses received and describe the situation of these DSOs regarding unbundling and provide detailed information on measures and policies under which DSOs are operating in our Contracting Parties.



- Several crucial parts of necessary provision of information is missing. The Secretariat would like to encourage the participants of the Energy Community DSO gas coordination platform to further engage in the monitoring process of the mandatory unbundling.
- We see the need for further provision of data. In the case of Moldova the data provision is sufficient, as only CG is under the unbundling obligation and has provided answers to all questions asked.
- Additionally, we see the need to receive answers also from DSOs which have not replied at all, but are obliged to be unbundled. In Georgia two DSOs would need to be included in the assessment and in Ukraine 8 DSOs would need to be included in order to represent all 31 DSO which are mandatory for unbundling.
- The Secretariat encourages the participants of the Energy Community DSO gas coordination platform to include compliance officers of their companies in the working group in order to allow to achieve a full assessment and further support the development of unbundling.
- The Secretariat would also recommend to NRAs to use this report for own checks of the unbundling situation of their DSOs and to communicate relevant issues with DSOs and with the Secretariat, if needed.

## Thank you for your attention Gregor Weinzettel – Gas Expert

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