

IOGP input on the European Commission's consultation on the priority list for the development of gas network codes and guidelines for 2021 (and beyond)

IOGP welcomes the opportunity to respond to the European Commission's proposed priority list regarding the development of gas network codes and guidelines for 2021 (and beyond). We agree that the development and implementation of gas network codes and guidelines is key to fully integrate the European internal gas market.

Gas network codes and guidelines on congestion management, capacity allocation, balancing, interoperability and data exchange, and transmission tariffs have already been adopted and are being implemented in Member States. The development and implementation of network codes and guidelines has required significant resources from all relevant parties including the Commission, ACER and ENTSOG, but certainly also from market participants. We believe that this was justified considering the positive market developments that have been achieved following implementation of the network codes.

In this context, the development of 'new gases' (such as biogas and hydrogen) can benefit from the common regulatory framework that supports the internal gas market. This framework provides security of gas supply as well as flexibility to deal with short-term fluctuations in supply and demand. We support ACER's recommendation in their recent Market Monitoring Report that *'decarbonisation efforts must go hand in hand with ensuring a well-functioning, fully integrated and competitive gas market. It is essential that clean transition does not lead to national market fragmentations'*.

Annual priorities for 2021 (and beyond)

IOGP supports the Commission's proposal not to include new items on the priority list for 2021 but to focus in 2021 on the implementation of the existing gas market rules in all Member States. According to ACER assessment on 2019, market integration is effective in areas covering three-quarters of the EU gas consumption and advancing in the others. This indicates that no additional network codes are needed for an efficient functioning of the internal gas market. We also acknowledge that the Commission's ongoing work on the revision of the Third Energy Package for gas in the context of the European Green Deal will require significant resources from all relevant parties in 2021 (and beyond).

In the previous consultation on the priority list for 2020 we mentioned that the considerations for a potential new electricity network code on cybersecurity apply to a large extent also to gas. Given that the Commission has decided on the need to develop a new electricity network code on cybersecurity in the period from 2020 to 2023, we suggest to consider – in due course – whether the electricity rules on cybersecurity warrant the development of a gas network code on cybersecurity.

We look forward to a continued dialogue with the European Commission, as well as with ACER and ENTSOG.

Best regards,



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