

Vereinigung der Fernleitungsnetzbetreiber Gas e.V. Georgenstraße 23 / D-10117 Berlin

Bundesnetzagentur  
Sabrina Schoenenberg  
Ruling chamber 4  
Tulpenfeld 4  
53113 Bonn

12 January 2015

**FNB Gas e.V. – Position on CEER Proposal “European Gas TSO Benchmarking”**

**Dear Ms. Schoenenberg,**

FNB Gas e.V. – the association of gas transmission system operators in Germany – welcomes the opportunity to comment on the preliminary results published by the consultancy SUMICSID as well as the proposals presented on the workshop on 1<sup>st</sup> of December 2014.

Throughout Europe fundamental structural differences exist, e.g. in regulatory approach, economic wealth/framework, cost calculation, technical standards and different operational tasks of TSOs. It has not been possible to develop a benchmarking method which ensures reliable comparability of cost and cost-explaining parameters as needed in order to achieve a realistic ranking for European TSOs. For instance, SUMICSID was engaged in a pan-European electricity benchmarking called “e3GRID”. The methodology used for this benchmarking faced comprehensive and extensive objections by the involved European grid operators and academics. The benchmarking model proposed in the “PE2GAS” interim report is virtually identical to the criticized model that was used in “e3GRID”.

Against this background we are convinced that a European Gas TSO benchmarking would not come to valid, reliable and fair results that may be justifiably and legitimately used to determine the allowed revenues of the addressed Gas TSOs.

In addition, we would like to stress the fact that the conflict of required data confidentiality and the need of verifiability as the precondition for contestability is irresolvable.

The attached position paper provides an abstract of our fundamental concerns. We would very much appreciate if our reservations serve as basis for your future discussions on European level.

Please do not hesitate to contact us for further information or support.

Sincerely Yours



Inga Posch  
Managing Director

**Vereinigung der  
Fernleitungsnetzbetreiber Gas e.V.**  
Georgenstraße 23 / D-10117 Berlin  
Telefon +49 30 9210 23 50  
Telefax +49 30 9210 23 543  
info@fnb-gas.de / www.fnb-gas.de

**Geschäftsführung:** Inga Posch  
**Vorstandsmitglieder:**  
Ralph Bahke, Vorsitzender  
Dr. Jörg Bergmann, Stellv. Vorsitzender  
Nicolas Delaporte, Schatzmeister  
Frank Heunemann, Vorstand

Amtsgericht Charlottenburg VR 32043B  
Steuernummer 27 / 620 / 61349  
Commerzbank Berlin  
KTO 210 304 200 / BLZ 100 400 00  
IBAN DE30 1004 0000 0210 3042 00  
BIC COBADEFFXXX