



CEER  
Cours Saint-Michel 30a  
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**Remarks of NET4GAS, s.r.o. on the Project PE2GAS „An approach for benchmarking European gas transmission system operators, Interim report R1”**

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Via this response to the consultation process NET4GAS, s.r.o., the transmission system operator from the Czech Republic, would like to repeat its fundamental remark raised on the PE2GAS Workshop W3 held on the 1 December 2014 in Brussels and ask to include it into the minutes of the meeting.

**Fundamental remark:**

The Interim report tries to define a “feasible” scope, necessary data and a “reliable” benchmarking model. But neither goals nor reasons for the pan-European benchmark of gas TSOs are explained in the report. Also the future utilization of the benchmark is not articulately described.

It is impossible to prepare a feasibility analysis for a potential pan-European benchmark of gas transmission system operators without knowing the exact goals and use of the findings of the project. Firstly, both sites, i.e. regulators and regulated companies alike, should be familiar with expected results of this project and its consequential impact on the national regulation. Secondly, the scope of the project and the potential benefits and cost cannot be assessed before knowing the goals.

Therefore before the whole project of pan-European benchmark of gas transmission system operators will continue, it is necessary to define the goals and also to specify the impact on national regulations.

NET4GAS, s.r.o.