

Dear all,

enclosed another feedback regarding the gas workshop!

Best,  
Sabrina

-----Ursprüngliche Nachricht-----

Von: Lauren Murphy [<mailto:Lauren.Murphy@ceer.eu>]

Gesendet: Montag, 12. Januar 2015 16:58

An: BK4-4

Betreff: Fw: Plinovodi d.o.o. comment on approach for benchmarking European gas transmission system operators

FYI

Best  
Lauren

----- Forwarded by Lauren Murphy/ceer on 12/01/2015 16:57 -----

From: Ileršič Marko <[Marko.Ilersic@plinovodi.si](mailto:Marko.Ilersic@plinovodi.si)>

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Date: 12/01/2015 16:56

Subject: Plinovodi d.o.o. comment on approach for benchmarking European gas transmission system operators

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Dear Sirs,

as there were some addresses misspelled in the mail below, please find attached the mail again.

Thank you for your understanding.

Yours sincerely,

Marko Ilersic, MScBA

Plinovodi d.o.o. <<http://www.geoplin-plinovodi.si/Index.asp?Jezik=0>>  
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From: Cimerman Franc  
Sent: Monday, January 12, 2015 4:33 PM

To: 'per.agrel@sumicsid.eu'; 'lauren.murphy@ceer.si'  
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Subject: Plinovodi d.o.o. comment on approach for benchmarking European gas transmission system operators

Dear Mr. Agrel, dear team of PE2GAS contributors,

Thank you for the invitation to the workshop on the 1st December 2014 in Brussels regarding Interim report of the study "An approach for benchmarking European gas transmission system operators". Plinovodi acknowledges all effort and knowledge which was included into Interim report.

The company Plinovodi as the independent transmission system operator (TSO) in Slovenia, has presented some remarks to the Interim report at the meeting in Brussels (the presentation is in your database), however please find also below our remarks and comments to the Interim report.

Remarks of Plinovodi are as follows:

- comparability. The biggest issue is how to achieve the comparability of participating TSOs. There are a huge variety of elements, which are different for each TSO. Beside the elements which influence mainly engineering solutions there is also broad spectrum of other issues following the different circumstances during construction, operating and additional extensions and development of the system. It is important to take into account also the ownership structure of comparing TSO and regulatory status (independent TSO in case of Plinovodi). One of important and open questions is if the study can even achieve a suitable and reliable statistic sample with satisfactory number of comparable TSOs considering all the specifics they have. Additionally, it is important to note that Italy and France don't participate in this study. Having in mind the importance of this two natural gas markets, the lack of these countries alone diminish the value of potential benchmarking study.
- transparency of the process and involvement of the TSOs. The participating TSOs shall be involved in all stages of the process. There should also be appropriate level of transparency of the used data, so that it would be clear that the same kind and type of data were used in all TSOs. Only participation of the same consultant – study provider cannot be a sufficient measure to achieve that. On the other hand, the possible study shall not be applied to the TSOs which will not participate in the study as they would not have the opportunity to take part in the process of the study preparation.
- suggestion of two additional criteria for assets diversification: (1) a new criteria for narrow valleys where already exist many longitudinal infrastructural lines (roads, telecommunication cables, electricity lines, water pipelines, rivers...) and (2) new criteria for very fragmented land ownership (number of land owners per distance unit).
- usage of US data. As many elements in natural gas transmission business in US are substantial different than in EU (i.e. safety standards, technical standards regulation, historical development, differences in sizes of the country...) Plinovodi doesn't see as appropriate to include the US data in potential benchmarking study.

Plinovodi are interested in the results of an expert benchmarking on the EU level however we don't see that this goal could be successfully reached through benchmarking framework as proposed in the Interim Report "An approach for benchmarking European gas transmission system operators".

Yours sincerely,

dr. Franc Cimerman,  
Director of Technical Department

Pozdrav/Regards,

Franc Cimerman

Direktor Tehničnega področja

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