



GUIDELINES OF GOOD PRACTICE ON THIRD PARTY ACCESS IN THE MEDITERRANEAN REGION

Monitoring of compliance

Working Group on Gas
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Scope and Objectives

The Association of the Mediterranean Regulators for Electricity and Gas (MEDREG), set up in 2006 as a working group and in 2007 as a non-profit association, has got among its general objectives “to promote the achievement of a consistent harmonized and investment-friendly regulatory framework aimed at providing the maximum benefits to energy consumers of the Mediterranean region”.

The Working Group on Gas, as stated in MEDREG Action Plan, has planned to study possible recommendations and requirements that could lead to the development of an integrated, competitive, secure and functioning gas market in the Mediterranean region, starting from the assessment of the current status of natural gas and LNG markets and of the sector regulation in the MEDREG countries and its expected evolution.

To achieve this objective of developing an integrated, competitive and secure gas market in the Mediterranean region in the long-run, one of the most important prerequisites is to ensure that all suppliers and consumers have easy-accessible and non-discriminatory access to infrastructures.

As foreseen in MEDREG Action Plan, the Working Group on Gas has the following tasks regarding Third Party Access (TPA):

- Study on TPA status in the region and future needs in order to develop an integrated Mediterranean market (2011).
- Guidelines of Good Practice on Third Party Access (GGP on TPA) in the Mediterranean region (2013).
- Monitoring of compliance with the GGP on TPA in the Mediterranean region (2015).

In December 2011 the General Assembly approved, at its 12th meeting, the report “Status review on Third Party Access in the Mediterranean region” which presents the results of the research regarding the first task.

In view of the results obtained, it can be stated that the situation of TPA to infrastructures in the Mediterranean region gas markets can be improved and some measures can be proposed pursuing to this goal, namely the development of Guidelines of Good Practice on Third Party Access in the Mediterranean region.

In November 2013 the General Assembly approved, at its 16th meeting, the document “Guidelines of Good Practice on Third Party Access in the Mediterranean region” which presents the results of the second task.

From the national regulatory authorities (NRA) perspective the TPA to the infrastructures should be extended as much as possible and the identified guidelines should be followed by the MEDREG countries. The Working Group on Gas also understands that, given the disparity of situations in the region, at the beginning it would be difficult to comply with all of the recommendations as markets are progressively developing.

In consequence, the different TPA requirements have been classified according to three priority levels, depending on the development degree of the natural gas markets concerned:

- Priority 1: Items that all MEDREG countries should comply with, independently from the development degree of their national gas markets.

- Priority 2: Items that all MEDREG countries where there is a TPA regime in place should comply with.
- Priority 3: Items that all MEDREG countries with more developed gas markets, in terms of penetration of gas consumption, openness and liberalization should comply with.

Now, in 2015, the MEDREG Working Group on Gas has developed the third task identified, to monitor the progress in implementing the Guidelines of Good Practice on Third Party Access in the Mediterranean region and the compliance with them. With that purpose, in March 2015, a questionnaire was sent to Gas Working Group members. 13 answers were received as presented in the next table:

Table 1: Contributions received from the MEDREG countries

	COUNTRIES	Answer received	Observations
1.	Albania	x	no gas market established
2.	Algeria		
3.	Bosnia-Herzegovina	x	no gas regulatory authority
4.	Croatia	x	
5.	Cyprus		no natural gas consumption
6.	Egypt	x	no gas regulatory authority
7.	France	x	
8.	Greece	x	
9.	Israel		
10.	Italy	x	
11.	Jordan	x	
12.	Libya		no answer
13.	Malta		no natural gas consumption
14.	Montenegro	x	no natural gas consumption
15.	Morocco		no gas regulatory authority
16.	Palestine	x	no gas regulatory authority
17.	Portugal	x	
18.	Slovenia		no answer
19.	Spain	x	
20.	Tunisia		no gas regulatory authority
21.	Turkey	x	
	Sum	13	

It is important to stress that several limitations and difficulties have been faced when carrying out this monitoring exercise, namely regarding the fact that not all regulators have completed the questionnaire circulated to obtain the required information. In eight of the countries, no answers were given and therefore no information regarding these countries is given in the present document. It is the case of Algeria, Cyprus, Israel, Libya, Malta, Morocco, Slovenia and Tunisia (2011 last information available refers that there is no gas consumption in Cyprus and Malta and no regulatory authority in Morocco and Tunisia).

From the 13 answers received, the monitoring analysis will focus in 8 countries (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey), since:

- Bosnia-Herzegovina, Egypt and Palestine have no regulatory authority for the moment;
- In Albania and Montenegro there is no natural gas consumption.

Monitoring the compliance with the Guidelines of Good Practice on Third Party Access in the Mediterranean region

The Guidelines of Good Practice on Third Party Access in the Mediterranean region focus on: market opening, unbundling, TPA to the infrastructures, network code and TPA rules, tariffs, methodologies for capacity allocation and congestion management, balancing, anti-hording mechanisms, quality of service and dispute settlement.

The monitoring report follows the same structure of the GGP on TPA. For each GGP identified, it is referred the countries that comply with the GGP and the ones that do not. Some comments provided by the members are also presented, in order to better understand the situation of each country.

Market opening

One of the issues that is intimately related with the TPA to infrastructures is the degree of market opening in each country, in order to evaluate, on the one hand, whether all gas consumers are eligible for choosing supplier in their country, and on the other hand, if there is a reasonable number of suppliers operating in the country. In this context, another issue that can be analyzed is the existence of mechanisms to promote market opening.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP1	1	<i>Is there a timetable/roadmap for gradual market opening, in order to achieve full market opening (meaning, inter alia, that all gas consumers are eligible for choosing supplier in their country)?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Croatia: According to the "Gas market act" ("Official Gazette", no. 28/13 and 14/14) all gas consumers are eligible for choosing gas supplier.

Greece: Emergent market derogation is that customers in the areas of the three distribution companies (EPAs) with consumption of less than 100 GWh are currently non eligible. According to the Gas Roadmap published in 2014, all customers will be eligible by 2018 (full market opening). No organized wholesale market yet.

Italy: In compliance with EU guideline.

Jordan: Not applicable.

Portugal: Full market opening is being applied since January 2010. 97% of total consumption is being supplied on the free market.

Turkey: The market law 4646 dated 2001 has outlined a timetable for contract release for the incumbent company. 6 bcm of gas contracts are release so far. With the renewal of contracts, LNG entry and the contract release, market opening has reached to 25 percent.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP2	2	<i>Are there national rules in place that facilitate the entrance of new suppliers?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		1 (Jordan)

Croatia: Entrance of new supplier in Croatian gas market is regulated by the “Energy law” (“Official Gazette”, no. 120/12, 14/14 and 95/15) and “Gas market act” (“Official Gazette”, no. 28/13 and 14/14).

Greece: Entry-Exit tariff system, TPA rules, CMP provisions, VTP, price revealing mechanism, all in place and incorporated.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP3	2	<i>Are there in place mechanisms to promote market opening, such as gas release auctions, short duration contracts and tariffs?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		1 (Jordan)

Croatia: Transmission system capacity is offered on yearly, monthly and daily basis. Also the tariffs are determined to correspond to that offer. Quarterly and within-daily capacity and tariffs are also envisaged soon.

Greece: Established in December of 2012 following the commitments of incumbent DEPA S.A. to the Hellenic Competition Commission (HCC, 551/VII/2012). DEPA SA is committed to release annually 10% of its last year annual sales of gas to the market for the next 10 years via quarterly auctions.

Italy: Italian Regulator has set specific cap for national gas supplier.

Portugal: Short duration contracts are approved for the access of all high pressure infrastructures (LNG terminal, underground storage and transmission network) facilitating the entrance of new smaller suppliers.

Unbundling

Other important issue is the level of unbundling of each infrastructure analyzed: transmission, underground storages and LNG terminals.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP4	1	<p><i>Are the TSO (Transmission System Operators) sufficiently functionally independent from the supply business of vertically integrated companies, in order to avoid conflicts of interest?</i></p> <p><i>Are the LSO (LNG System Operators) sufficiently functionally independent from the supply business of vertically integrated companies, in order to avoid conflicts of interest?</i></p> <p><i>Are the system operators SSO (Storage System Operators) sufficiently functionally independent from the supply business of vertically integrated companies, in order to avoid conflicts of interest?</i></p> <p><i>Are the system operators DSO (Distribution System Operators) sufficiently functionally independent from the supply business of vertically integrated companies, in order to avoid conflicts of interest?</i></p>
Yes		7 (Croatia, France, Greece, Italy, Jordan, Portugal and Spain)
No		1 (Turkey)

Croatia: The activity of the transmission system operator, gas storage system operator, the LNG facility operator and the distribution system operator, including the operator which is a part of a vertically integrated undertaking, must be organized as an independent legal entity, autonomous from other activities in the gas sector, as is prescribed by the "Gas market act" ("Official Gazette", no. 28/13 and 14/14). These provisions do not apply to the distribution system operator who forms a part of the vertically integrated undertaking with less than 100.000 customers connected to the distribution system. Furthermore, energy undertakings for gas must unbundle their accounting activities in order to apply the principle of non-discrimination of gas system users, to avoid the distortion of market competition and mutual subsidizing of energy activities conducted as market ones and energy activities performed as public services. Exceptionally, the activities of the transmission system operator, distribution system operator, storage system operator and LNG system operator may be organized jointly, as a combined system operator, but separate from the gas production, gas trade and gas supply.

France: Access to storage is negotiated.

Greece: DSO (Distribution System Operators) is not sufficiently functionally independent from the supply business of vertically integrated companies, in order to avoid conflicts of interest.

Italy: According to NRA's Decisions.

Portugal: REN is the owner of LNG terminal, underground storage and transmission network, being independent from other market payers.

Turkey: Only DSOs are legally unbundled from the trading company.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP5	1	<p><i>Does the system in place for unbundling effective in removing conflict of interests between producers, suppliers and system operators (TSO, LSO, SSO and DSO), in order to create incentives for the necessary investments and guarantee the access of new market entrants under a transparent and efficient regulatory regime?</i></p>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Croatia: Transmission system operator, storage system operator, the LNG system operator and distribution system operator independently decide about the resources necessary for the operation, management and development of the system they manage, unrelated to other activities conducted by the vertically integrated undertaking. Also every operator is required to adopt a program of measures to ensure the application of an unbiased access to the system it manages, and to ensure the monitoring of its implementation. Furthermore, an annual report about the implementation of the measures from the aforementioned program must be submitted to HERA by 1 March of each year for the previous year and posted on operator's website.

Italy: Promote new investments for gas tariffs incentives.

Jordan: Not applicable.

Portugal: Besides the fact that high pressure infrastructures (LNG terminal, underground storage and transmission network) are owned by and independent and non-vertical integrated company, they are subjected to regulation, being the TPA rules and tariffs approved by ERSE.

Turkey: Partly. Although there is no legal unbundling in place, the system operator is required to serve to customers on equal basis.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP6	2	<i>Do the national regulatory authorities establish an appropriate regulatory environment, namely for the activities with regulated TPA?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Croatia: The gas producer, transmission system operator, distribution system operator, gas storage system operator and the LNG facility operator must enable efficient and non-discriminatory access to the upstream pipeline network, the transmission system, distribution system, gas storage system and LNG facility, as is prescribed by the "Gas market act" ("Official Gazette", no. 28/13 and 14/14). Access to the transmission system, distribution system, gas storage system and the LNG facility is enabled through regulated third party access, while access to upstream pipeline network is enabled by applying a negotiated third party access. TPA is based on the published methodologies for determining tariffs for the energy activities of gas transmission, gas distribution, gas storage and the LNG facility management, which are applied fairly and non-discriminately to all gas market participants. The negotiating approach of the third party is based on commercial conditions for access to the upstream pipeline network, which are the subject of negotiations.

Italy: through the settlement of tariffs and network codes.

Jordan: Not applicable.

Portugal: All the high pressure infrastructures (LNG terminal, underground storage and transmission network) are subjected to regulation.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP7	3	<i>Do the national regulatory authorities certify the type of unbundling applied to the TSO (a competency that arises for EU countries from the Gas Directive EC/73/2009)?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Croatia: HERA conducts process of certification of TSO which is prescribed by the "Gas market act" ("Official Gazette", no. 28/13 and 14/14).

Greece: DESFA the Greek TSO was certified by RAE, as an ITO on September 2014. DESFA S.A. is the owner and operator of the NNGS, which is comprised of the main high pressure pipeline and its branches, as well as the LNG Terminal at the Revithoussa island. DESFA S.A. has exclusive rights for the operation, maintenance, development and exploitation of the NNGS and is currently the only gas transmission system operator in the country.

Jordan: Not applicable.

Portugal: As the national regulatory authority for electricity and gas sectors, ERSE has the duty to supervise the effectiveness of the independence and full legal and ownership unbundling of TSOs from the activities of generation and supply, namely evaluating possible conflicts of interest of its shareholders and administrative and supervisory board members. ERSE's Certification Decision, on September 9, 2014, established 11 certification conditions, to be fulfilled within the period of 8 months, targeted to overcome the issues of non-compliance of TSOs with the guarantees of independence. ERSE has decided on July 31st 2015, to make effective its own decision of certification of REN Gasodutos, S.A., as the transmission system operator of the national natural gas transmission network (RNTGN), in the regime of full ownership unbundling, after verification of full compliance, by the operators, of the 11 certification conditions set by ERSE on September 9, 2014. With the conclusion of the process for the certification of the electricity and natural gas transmission system operators, ERSE shall keep supervising the full compliance of these operators with the legal and ownership unbundling certification requirements, according to the national legislation and European directives.

Third Party Access to the infrastructures

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP8	1	<i>Do TSO, LSO and SSO provide easy and non-discriminatory access to their infrastructure?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Jordan: Not applicable.

Italy: According to the network approved by the Authority.

Turkey: It is clearly enshrined in the Network codes of TSO, SSO and the LSOs that the system operator has to provide access on an equal basis. The network code is published after the Regulatory Board's decision. Non-discriminatory access is allowed to MEDREG and other regional-international companies as they fulfill license conditions. There are indeed regional companies licensed by EMRA and doing natural gas business in Turkey.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP9	1	<i>Do TSO co-operate with other TSO to ensure interoperability between different systems and efficient and non-discriminatory procedures facilitating trade and allowing network users to transport natural gas throughout the MEDREG region?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Greece: YES for technical cooperation.

Jordan: Not applicable.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP10	2	<i>Is there an objective, transparent and non-discriminatory implementation of a system of regulated TPA to the transmission and distribution system, and LNG facilities based on published tariffs, applicable to all eligible customers, including supply undertakings, and applied objectively and without discrimination between system users?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Jordan: Not applicable.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP11	3	<i>Are there procedures (regulated or negotiated access) in place for the organisation of access to storage facilities and linepack when technically and/or economically necessary for providing efficient access to the system for the supply of customers, as well as for the organisation of access to ancillary services? Do those procedures operate in accordance with objective, transparent and non-discriminatory criteria?</i>
Yes		6 (Croatia, France, Italy, Portugal, Spain and Turkey)
No		1 (Jordan)

France: access to storage is negotiated.

Greece: Not applicable.

Italy: according to the third EU energy package we use regulated access.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP12	3	<i>Do TSO and LSO offer unbundled TPA services for access to pipelines and LNG facilities as well as all necessary ancillary services to the extent that such facilities are operated by the TSO (ancillary services include allocation, blending, quality monitoring, metering and balancing)?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Italy: Have regasification code for implementing services.

Jordan: Not applicable.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP13	3	<i>Do SSO offer unbundled TPA services to storage facilities which are technically and/or economically necessary for providing efficient access to the system for the supply of customers?</i>
Yes		5 (Croatia, France, Italy, Portugal and Turkey)
No		1 (Spain)

France: A public consultation is on-going on the access to SSO facilities. The currently negotiated TPA may become regulated in the coming years.

Greece, Jordan: Not applicable.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP14	2	<i>Do TSO, LSO and SSO offer the same range of services on the same conditions according to the principle of non-discrimination to any eligible third party within the MEDREG region?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

France: The suppliers of domestic consumers are under obligation to subscribe a certain amount of storage capacity, for security of supply reasons.

Jordan: Not applicable.

Network Code and Third Party Access rules

One of the issues that has also to be referred to is the existence of TPA rules published in an individual document or included in the Network Code and who is the entity responsible for their approval.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP15	1	<i>Are TPA rules established and published in an individual document or included in the Network Code, following proper consultation with network users?</i>
Yes		5 (Croatia, Greece, Italy, Portugal and Turkey)
No		1 (France and Spain)

Croatia: TPA Rules are prescribed in the Gas market act ("Official Gazette", no. 28/13 and 14/14) and in Network rules of each system operator. HERA gives opinion on the Gas market act before its adoption and its consent on Network rules.

Greece: There was a 3rd amendment of TPA Rules in place. Changes included redesign of the capacity booking system (only entry, or only exit capacity booking is feasible). Operation of a virtual point where gas quantities are delivered and sold. All CMP provisions incorporated (i.e., LTUIOLI, OS&BB, Surrender of capacity). The TSO is offering on average 7%-8% of extra firm capacity to the market every month. Introduction of interruptible and reverse products.

France: For TSOs: CAM NC, CRE tariff deliberations published on CRE website and standard access contract published on the web site.

Jordan: Not applicable.

Portugal: The TPA rules are established in the Grid Access and Infrastructure Code which is approved and published by ERSE, after a public consultation to all interested market players.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP16	2	<i>Are Third Party Access rules approved by the national regulatory authorities?</i>
Yes		6 (Croatia, France, Greece, Italy, Portugal and Turkey)
No		1 (Spain)

Croatia: TPA Rules are prescribed in the Gas market act ("Official Gazette", no. 28/13 and 14/14) and in Network rules of each system operator. HERA gives opinion on the Gas market act before its adoption and it's consent on Network rules.

France: TSO, DSO and LSO.

Italy: contained in the network code.

Jordan: Not applicable.

Portugal: The Access to Networks, Infrastructures and Interconnections Code and the Operation of Infrastructures Code are approved by the regulator, the operational procedures are proposed by the operators and approved by the regulator.

Tariffs

One of the most important issues regarding TPA are the tariffs, namely the type of tariffs that are in place, who approves them and the criteria used to both design and apply them.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP17	2	<i>Are national regulatory authorities responsible for fixing or approving tariffs, or the methodologies underlying the calculation of these tariffs, on the basis of a proposal by the TSO or LSO, or on the basis of a proposal agreed between those operator(s) and the users of the network?</i>
Yes		6 (Croatia, France, Greece, Italy, Portugal and Turkey)
No		1 (Spain)

Croatia: HERA prescribes methodologies for determining of the amount of tariff items for energy activities of gas transmission, gas distribution, public service of gas supply and a guaranteed supply, gas storage and LNG facility. Operators are obliged to submit an application to HERA for determining or changing the amount of tariff items, with all requested information and documentation prescribed by the relevant methodology. HERA can accept proposed tariff amounts from the operators or can set tariff amounts independently.

France: CRE is responsible for fixing the tariffs.

Greece: RAE approved the Tariff Regulation in July 2012 setting a new entry-exit tariff system in line with Regulation 715/2009. The tariff methodology is based on the principle of recovering a Required Revenue. Separate capacity and commodity charge for each entry point and exit zone. Pricing of reserved capacity is based on entry and exit points of the Transmission System (entry-exit system), regardless of the actual transportation route of the natural gas. Specifically, the National Natural Gas System is divided into three (3) entry points and three (3) exit zones. The methodology of Price Control for the TSO is established. The normalisation of invoices (Price Control Period) is set at a twenty (20) year period. Every four (4) years, a regular revision of tariffs will be held.

Italy: NRA responsible for fixing or approving the methodologies underlying the calculation of tariffs but not the tariffs.

Jordan: Not applicable.

Portugal: ERSE is responsible for the elaboration and approval of the Tariff Code which establishes the methodologies underlying the calculation of tariffs. Additionally Natural gas tariffs are established once a year and adjusted on quarterly basis.

Turkey: All the gas network charges are regulated in Turkey. Networks tariffs are set for each entry point. Exit point charges are single. We can't assurance of tariff methodologies with the MEDREG countries.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP18	2	<p><i>Do the national regulatory authorities ensure that transmission and distribution tariffs:</i></p> <ul style="list-style-type: none"> • <i>fully comply with the principle of non-discrimination?</i> • <i>are transparent?</i> • <i>are cost-reflective, insofar as such costs correspond to those of an efficient and structurally comparable network operator and are transparent, whilst including appropriate return on investments?</i> • <i>take into account the need for system integrity and its improvement?</i> • <i>take into account the long-term, marginal, avoided network costs from demand-side management measures?</i> • <i>facilitate efficient gas trade and competition?</i> • <i>provide incentives for investment?</i> • <i>avoid cross-subsidies between network users?</i> • <i>maintain or create interoperability for transmission networks?</i> • <i>provide convergence of charging principles and tariff structures between MEDREG countries?</i>
Yes		6 (Croatia, France, Greece, Italy, Portugal and Turkey)
No		1 (Spain)

Jordan: Not applicable.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP19	2	<i>Are those tariffs, or the methodologies underlying their calculation, approved and published prior to their entry into force?</i>
Yes		6 (Croatia, France, Greece, Italy, Portugal and Turkey)
No		1 (Spain)

Croatia: Methodologies and corresponding tariffs are set and published by HERA prior to their entry into force.

Jordan: Not applicable.

Portugal: The Tariff Code which establishes the methodologies underlying the calculation of tariffs and also the tariffs established yearly by ERSE are published prior to their entry into force, on the Official, being always available on ERSE website.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP20	3	<i>Are tariffs for network users set separately for every entry point into or exit point out of the transmission system?</i>
Yes		6 (France, Greece, Italy, Portugal, Spain and Turkey)
No		1 (Croatia)

Croatia: Tariffs for transmission network users are set separately for every group of entry points into (interconnections, production, storage) or exit point out (domestic, storage, interconnections) of the transmission system, as is prescribed by the "Methodology for determining the amount of tariff items for gas transmission" ("Official Gazette", no. 85/13 and 158/13).

France: Equalization for some set of points.

Jordan: Not applicable.

Turkey: Partly

Methodologies for Capacity Allocation and Congestion Management

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP21	1	<i>Do TSO, LSO and SSO design capacity services to facilitate trading and reutilisation of capacity?</i>
Yes		6 (Croatia, France, Greece, Italy, Portugal and Spain)
No		1 (Turkey)

Jordan: Not applicable.

Turkey: Except SSO.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP22	2	<i>Do TSO, LSO and SSO implement and publish non-discriminatory and transparent capacity allocation mechanisms and when applicable congestion management procedures?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		0

Croatia: Capacity allocation and congestion management for transmission system is prescribed by TSO in "Network rules of gas transmission system" and for gas storage system it is prescribed by SSO in "Terms of usage of gas storage system", with consent of HERA for both acts. These Network codes are published on the web site of HERA and on the web sites of each system operator.

France: harmonized at EU level.

Italy: European Network code.

Jordan: Not applicable.

Portugal: Annual, monthly and weekly scheduled programs and daily nomination for capacity allocation. Congestion management by explicit auctions according to existing market rules already published based on payment for right of capacity on a marginal bid basis.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP23	2	<i>Are the capacity allocation mechanisms and when applicable congestion management procedures approved by the national regulatory authority?</i>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)

No	0
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Croatia: Capacity allocation and congestion management for transmission system is prescribed by TSO in "Network rules of gas transmission system" and for gas storage system it is prescribed by SSO in "Terms of usage of gas storage system", with consent of HERA for both acts. These Network codes are published on the web site of HERA and on the web sites of each system operator.

France: Harmonized at EU level.

Portugal: ERSE has explicit legal competences and must approve the methodologies of capacity allocation under public consultation process. ERSE is responsible for ensuring that allocation rules are being applied in the correct way, being the TSO responsible for the technical and administrative part of the application of the allocation mechanism.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP24	2	<p><i>Do the capacity-allocation mechanisms:</i></p> <ul style="list-style-type: none"> • <i>ensure that the maximum capacity at all relevant points is available to market participants?</i> • <i>take into account system integrity and efficient operation?</i> • <i>provide appropriate economic signals for the efficient and maximum use of technical capacity?</i> • <i>facilitate the development of competition and liquid trading of capacity?</i> • <i>neither hamper the entry of new market participants and of companies with a small market share nor create undue barriers to market entry?</i> • <i>foster investment in new infrastructure?</i> • <i>facilitate cross-border exchanges in natural gas?</i>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)
No		0

Italy: According to EU Regulation 984/2013 and 312/2014.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP25	3	<p><i>Are the capacity-allocation mechanisms market-based?</i> <i>Do solutions such as pro-rata mechanisms or 'first-come first- served' considered, if they provide equivalent safeguards for non-discriminatory and competitive access?</i></p>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)
No		0

Croatia: Pro-rata mechanism is prescribed in "Network rules of gas transmission system" and also in "Terms of usage of gas storage system".

France: Uses auctions as described in the CAM NC.

Turkey: Pro-rate is applied.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP26	3	<i>Are appropriate congestion management procedures used in each country depending on each specificity, namely surrender of capacity, oversubscription and buy-back and Use It or Lose It procedures?</i>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)
No		0

Croatia: Congestion management procedures that are prescribed in "Network rules of gas transmission system" are the following: return of contracted firm capacity, "use it or lose it" and oversubscription and buy-back. Congestion management procedures that are prescribed in "Terms of usage of gas storage system" are "use it or sell" it and sell of interruptible capacity.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP27	3	<i>Do national regulatory authorities and TSO endeavour to harmonise (and at least make compatible) capacity allocation mechanisms and congestion management procedures in order to facilitate trade between MEDREG countries?</i>
Yes		5 (Croatia, France, Italy, Jordan and Portugal,)
No		3 (Greece, Spain and Turkey)

Greece: Currently there is under way a bilateral effort within the framework of ACER GRI concerning common capacity allocation procedures and bundling of capacity products between Bulgaria and Greece. No such effort has started with Turkey yet.

Balancing

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP28	2	<i>Are national regulatory authorities responsible for fixing or approving, prior to their entry into force, at least the methodologies used to calculate or establish the terms and conditions regarding the provision for balancing services?</i>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)
No		0

Croatia: HERA prescribes the "Methodology for determining the price of balancing energy of the gas system" ("Official Gazette", no. 155/14) and according to the prescribed methodology Croatian gas market operator (HROTE) determines a price of positive and negative balancing energy, monthly for gas days of the following month. Terms and conditions regarding the provision for balancing services are prescribed by "Ordinance on the gas market organization" which are adopted by HROTE with the consent of HERA.

Greece: According to the provisions regarding gas balancing services, as included in the Greek legislation, DESFA S.A. prepares and submits every year to RAE for approval an annual balancing plan. The balancing plan includes the estimates of the TSO regarding balancing gas needs, as well as an evaluation of possible balancing gas supply sources for the following year. The plan also

includes DESFA's proposal regarding the characteristics of the balancing contracts for the next year. All costs arising from the provision of balancing services are recovered by the TSO through relevant charges paid by the users, so that the TSO is cash neutral. RAE is responsible for approving the balancing costs and the methodology for allocating these costs to the Transmission System users. All balancing charges and the methodology for their calculation, as well as the Daily Balancing Gas Price, are published on DESFA's website, in both Greek and English. RAE and the TSO DESFA are in the process of finalizing the road map for the implementation of the Balancing Network Code provisions and their incorporation in the Greek Network Code. The balancing scheme currently in place is designed on a daily basis, with daily imbalance charges, and a monthly cash-out. The Balancing platform, credit risk arrangements and definition of short-term standardized products should be in place by 2016. RAE launched a public consultation (2 phase) for the amendment of the Gas Network Code, it is safe to assume that it will do so for a third amendment concerning Balancing provisions.

Italy: EU regulation 312/2014.

Turkey: Balancing gas is currently provided by a single company on a monthly basis. A consultation and simulation process is ongoing regarding making the balancing regime market-based and the transactions are to be realized on a daily basis.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP29	2	<p><i>Are balancing rules:</i></p> <ul style="list-style-type: none"> • <i>designed in a fair, non-discriminatory and transparent manner?</i> • <i>based on objective market based criteria?</i> • <i>ensure effective market access for all market players, including new entrants?</i> • <i>reflect genuine system and market needs taking into account the resources available to the TSO and to network users?</i> • <i>avoid cross-subsidisation between system users?</i> • <i>ensure compatibility of balancing regimes in MEDREG countries, in order to facilitate cross-border gas trade?</i>
Yes		7 (Croatia, France, Greece, Italy, Jordan, Portugal and Spain)
No		1 (Turkey)

Greece: Do not ensure compatibility of balancing regimes in MEDREG countries, in order to facilitate cross-border gas trade

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP30	2	<p><i>Do national regulatory authorities and TSO endeavor to harmonise (and at least make compatible) balancing regimes and streamline structures and levels of balancing charges in order to facilitate trade between MEDREG countries?</i></p>
Yes		5 (Croatia, France, Italy, Jordan and Portugal)
No		3 (Greece, Spain and Turkey)

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP31	3	<i>Is the development of balancing rules and any subsequent changes subject to appropriate consultation with market participants? Are decisions supported by objective criteria and analysis?</i>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)
No		0

Croatia: HROTE publishes draft of "Ordinance on the gas market organization" with the consent of HERA in which balancing rules are prescribed, and then makes a public hearing for appropriate consultation with market participants which lasts for 15 days.

Anti-hoarding mechanisms

One of the issues that is also important, in what regards TPA analysis, is the existence of anti-hoarding mechanisms.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP32	2	<i>Are there anti-hoarding mechanisms in place, such as overbooking and Use It or Lose It and sell of interruptible capacity?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal Spain and Turkey)
No		1 (Jordan)

Croatia: Anti-hoarding mechanisms that are prescribed in "Network rules of gas transmission system" are the following: return of contracted firm capacity, use it or lose it and oversubscription and buy-back. Anti-hoarding mechanisms that are prescribed in "Terms of usage of gas storage system" are "use it or sell" it and sell of interruptible capacity.

Greece: According to RAE's decision 526/2013, there was a second amendment of the gas network code. This amendment introduced among others anti-hoarding provisions such as Long Term use or lose it, buyback and overbooking on the GR-BG and GR-TU IPs.

Italy: Case by case.

Portugal: Traders must justify their customers' needs when scheduling their programs and allocated capacities not confirmed in the subsequent scheduling processes is made available to the market players - use it or lose it.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP33	3	<i>Are there gas-release programmes in place, as one of the possible measures that can be used to promote effective competition and ensure the proper functioning of the market?</i>
Yes		5 (France, Greece, Italy, Portugal and Turkey)
No		3 (Croatia, Jordan and Spain)

Greece: Established in December of 2012 following the commitments of incumbent DEPA S.A. to the Hellenic Competition Commission (HCC, 551/VII/2012). DEPA SA is committed to release annually 10% of its last year annual sales of gas to the market for the next 10 years via quarterly

auctions (approx. 350 mcm/year). Authorized natural gas suppliers, customers and the EPAs can participate in auctions. A redesign of the GRP to enhance liquidity in the market was triggered in 2013 and decided upon in the summer of 2014 following close cooperation among HCC, RAE, DEPA and market participants. Both annual and quarterly auctions will be held from October 2014 onwards. The reserve price methodology and price to be reviewed/checked by RAE.

Italy: case by case.

Portugal: Gas release auctions and short duration and utilization tariffs.

Quality of service

Another issue that can be analyzed is the quality of service, namely if quality rules or Codes exist and who is the competent entity for quality of service.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP34	1	<i>Are quality rules or Code in place?</i>
Yes		7 (Croatia, France, Italy, Jordan, Portugal, Spain and Turkey)
No		1 (Greece)

Croatia: Quality rules and quality of service are prescribed by HERA in "General conditions of gas supply" ("Official Gazette", no. 158/13) and are also prescribed in the "Gas market act" ("Official Gazette", no. 28/13 and 14/14).

Greece: In the Distribution licenses of the three EPAs, the only three DSOs in Greece so far, there certain quality rules and standards in place. Similar rules and standards exist the in gas network code.

Italy: AEEGSI for commercial quality, Ministry for Economic Development for Technical Quality.

Turkey: The quality of service regulations are in effect only for the DSOs.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP35	2	<i>Are the national regulatory authorities the competent entities for ensuring quality of service?</i>
Yes		7 (Croatia, France, Greece, Italy, Jordan, Portugal and Turkey)
No		1 (Spain)

Croatia: Quality rules and quality of service are prescribed by HERA in "General conditions of gas supply" ("Official Gazette", no. 158/13) and are also prescribed in the "Gas market act" ("Official Gazette", no. 28/13 and 14/14).

Portugal: ERSE is responsible for publishing the Quality of Service Code and supervising its enforcement.

Dispute settlement

The last issue to be analyzed is the dispute settlement, namely its existence and the competent entities.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP36	1	<i>Is greater consumer protection guaranteed by the availability of effective means of dispute settlement for all consumers?</i>
Yes		8 (Croatia, France, Greece, Italy, Jordan, Portugal, Spain and Turkey)
No		0

Croatia: Measures for protection of final customers regarding their complaints about gas supply and changing of supplier are prescribed by HERA in "General conditions of gas supply" ("Official Gazette", no. 158/13). Regarding final customer's complaints HERA can adopt a binding decision on the procedure, give a non-binding proposal of treatment or give a non-binding opinion, all within prescribed 30 days period.

Italy: thorough resolution systems.

Turkey: All stake-holders (from household customers to licensed companies) can apply to EMRA for dispute settlement and make complaints.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP37	1	<i>Are there in place speedy and effective complaint handling procedures?</i>
Yes		7 (Croatia, France, Greece, Italy, Portugal, Spain and Turkey)
No		1 (Jordan)

Croatia: Measures for protection of final customers regarding their complaints about gas supply and changing of supplier are prescribed by HERA in "General conditions of gas supply" ("Official Gazette", no. 158/13). Regarding final customer's complaints HERA can adopt a binding decision on the procedure, give a non-binding proposal of treatment or give a non-binding opinion, all within prescribed 30 days period.

Greece: RAE is constantly informing consumers through its website, for all recent developments of electricity and gas markets. RAE is providing consumers, information about their rights and the proper and necessary actions to be taken by them, based on those rights. Complaints are received threefold i) direct complaints filed to RAE, ii) complaints reaching RAE through other public services and authorities iii) complaints filled from suppliers either of electricity or of gas and iv) complaints reaching RAE through the Ministry of Energy and Reconstruction, to which by mistake the complaint was filled initially.

GGP #	Priority Degree	Guidelines of Good Practice on Third Party Access
GGP38	2	<i>Are national regulatory authorities the competent entities for dispute settlement?</i>
Yes		7 (Croatia, France, Greece, Italy, Jordan, Portugal, and Turkey)
No		1 (Spain)

Croatia: HERA is the competent entity for dispute settlement regarding gas operators as it is prescribed in the “Gas market act” (“Official Gazette”, no. 28/13 and 14/14).

France: CRE is responsible for dispute settlement between TSOs, DSOs, LSOs, SSOs and shippers. Another authority (Médiateur de l’Energie) is responsible for disputes involving final consumers.

Greece: According to Article 37 of Law 4001/2011 RAE is indeed the competent authority for dispute settlement.

Portugal: ERSE has powers to: (1) Extrajudicial resolution dispute settlement through mediation and conciliation methods in disputes between suppliers and customers; (2) Take an administrative binding decision applicable to the regulated entity (DSO and TSO and last resource suppliers), concerning the regulated matters and tariffs.

Conclusions and way forward

Main general conclusions

From the national regulatory authorities perspective, the TPA to the infrastructures shall be extended as much as possible and the guidelines identified shall be followed by the MEDREG countries.

A first step for the implementation of the Guidelines of Good Practice on Third Party Access in the Mediterranean region was foreseen to be made during 2014.

The progress in implementing the Guidelines of Good Practice on Third Party Access in the Mediterranean region and compliance with them will be monitored regularly by the MEDREG Working Group on Gas.

The first monitoring of compliance with the GGP on TPA has now been done, in 2015, through the present report. The conclusions are shown in the following tables for each of the GGP on TPA.

Table 2: Status review of GGP on TPA in the MEDREG countries

Aspects addressed	GGP	Priority	Croatia	Egypt	France	Greece	Italy	Jordan	Portugal	Spain	Turkey	Total (Yes)		
Market opening	GGP1	1	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	88%
	GGP2	2	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	7	88%	
	GGP3	2	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	7	88%	
Unbundling	GGP4	1	Yes	No/Yes	Yes	Yes/No	Yes	Yes	Yes	Yes	No	7	88%	88%
	GGP5	1	Yes	NA	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
	GGP6	2	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
	GGP7	3	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
Third Party Access to the infrastructures	GGP8	1	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	82%
	GGP9	1	Yes	NA	Yes	Yes/No	Yes	NA	Yes	Yes	Yes	7	88%	
	GGP10	2	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
	GGP11	3	Yes	NA	Yes	NA	Yes	No	Yes	Yes	Yes	6	75%	
	GGP12	3	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
	GGP13	3	Yes	No	Yes	NA	Yes	NA	Yes	No	Yes	5	63%	
Network Code and Third Party Access rules	GGP14	2	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	69%
	GGP15	1	Yes	No	No	Yes	Yes	NA	Yes	No	Yes	5	63%	
Tariffs	GGP16	2	Yes	No	Yes	Yes	Yes	NA	Yes	No	Yes	6	75%	75%
	GGP17	2	Yes	No	Yes	Yes	Yes	NA	Yes	No	Yes	6	75%	
	GGP18	2	Yes	No	Yes	Yes/No	Yes	NA	Yes	No	Yes	6	75%	
	GGP19	2	Yes	No	Yes	Yes	Yes	NA	Yes	No	Yes	6	75%	
Methodologies for Capacity Allocation and Congestion Management	GGP20	3	No	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	6	75%	89%
	GGP21	1	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	No	6	75%	
	GGP22	2	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
	GGP23	2	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	
	GGP24	2	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	
	GGP25	3	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	
	GGP26	3	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	
Balancing	GGP27	3	Yes	NA	Yes	No	Yes	Yes	Yes	No	No	5	63%	88%
	GGP28	2	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	
	GGP29	2	Yes	No	Yes	Yes/No	Yes	Yes	Yes	Yes	No	7	88%	
	GGP30	2	Yes	NA	Yes	No	Yes	Yes	Yes	No	No	5	63%	
Anti-hoarding mechanisms	GGP31	3	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	75%
	GGP32	2	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	7	88%	
Quality of Service	GGP33	3	No	No	Yes	Yes	Yes	No	Yes	No	Yes	5	63%	88%
	GGP34	1	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	7	88%	
Dispute settlement	GGP35	2	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	7	88%	92%
	GGP36	1	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	
	GGP37	1	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	7	88%	
	GGP38	2	Yes	No	Yes	Yes	Yes	Yes	Yes	No	Yes	7	88%	
Total (Yes)	---	---	36	0	37	33	38	14	38	27	33	---		
NA: Not applicable.			95%	0%	97%	87%	100%	37%	100%	71%	87%			
87%														

Table 3: Status review of GGP on TPA in the MEDREG countries with level of priority 1

Aspects addressed	GGP	Priority	Croatia	Egypt	France	Greece	Italy	Jordan	Portugal	Spain	Turkey	Total (Yes)		
Market opening	GGP1	1	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	88%
Unbundling	GGP4	1	Yes	No/Yes	Yes	Yes/No	Yes	Yes	Yes	Yes	No	7	88%	88%
	GGP5	1	Yes	NA	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	
Third Party Access to the infrastructures	GGP8	1	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	Yes	7	88%	88%
	GGP9	1	Yes	NA	Yes	Yes/No	Yes	NA	Yes	Yes	Yes	7	88%	
Network Code and Third Party Access rules	GGP15	1	Yes	No	No	Yes	Yes	NA	Yes	No	Yes	5	63%	63%
Methodologies for Capacity Allocation and Congestion Management	GGP21	1	Yes	No	Yes	Yes	Yes	NA	Yes	Yes	No	6	75%	75%
Quality of Service	GGP34	1	Yes	No	Yes	No	Yes	Yes	Yes	Yes	Yes	7	88%	88%
Dispute settlement	GGP36	1	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	8	100%	94%
	GGP37	1	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	7	88%	
Total (Yes)	---	---	10	0	9	9	10	3	10	9	8	---		
			100%	0%	90%	90%	100%	30%	100%	90%	80%			
			90%											

The main conclusion of this monitoring exercise is that regulated TPA to the infrastructures is linked to the degree of the gas market opening. Many of these obligations are stated for EU countries at the gas Directive EC/73/2009 and the Regulation EC/715/2009. The more developed a gas market is, in terms of penetration of gas consumption, openness and liberalization, the more likely is that TPA to the infrastructures is regulated, the rules for access the infrastructures are published and the regulator has competencies regarding the approval of these rules and of the access tariffs to the infrastructures.

Generally and as a conclusion per subject it is possible to remark:

- The status of market opening, the unbundling, the general issues related to TPA to the infrastructures, the existence of methodologies for capacity allocation and congestion management, the balancing, the quality of service and the dispute settlement are generally satisfactory in the countries that answered the questionnaire.
- The Network Code and TPA rules, the transmission access tariffs and the existence of anti-hording mechanisms need some improvement.

As a conclusion of an analysis per country, it can be stated that:

- There is a group of countries, with more than 80% of existence and implementation of GGP on TPA – Croatia, France, Greece, Italy, Portugal and Turkey, – where generally all consumers are eligible to choose their supplier, there is more than one supplier, the access to the infrastructures is generally regulated and the TPA rules are published and available to all users as well as the methodologies for capacity allocation and congestion management. The tariffs are entry-exit, both anti-hording mechanisms and mechanisms to promote market opening are in place and the regulators have competencies regarding unbundling, TPA, tariffs and quality of service.
- Considering all the GGP, the average of compliance of all countries is 87% and, considering only the GGP with priority level 1, this average increases to 90%.
- Jordan has no liberalized market.
- Bosnia-Herzegovina, Egypt and Palestine have no regulatory authority for the moment.
- In Albania and Montenegro there is no gas consumption.
- In Algeria, Cyprus, Israel, Libya, Malta, Morocco, Slovenia and Tunisia no answers were given and so it was not possible to integrate them in this study (2011 last information available refers that there is no gas consumption in Cyprus and Malta and no regulatory authority in Morocco and Tunisia).

Future improvements

It is important to state again that several limitations and difficulties have been encountered when carrying out this study, which has prevented the results to be more detailed or complete, namely because not all the regulators have answered the questionnaire. In eight of the countries, no answers were given and therefore no information for these countries is in the present document. It is the case of Algeria, Cyprus, Israel, Libya, Malta, Morocco, Slovenia and Tunisia.

The participation of all MEDREG countries in answering the questionnaires is of primordial importance enabling to share information and knowledge among all in light of the common interest. The sharing of information and knowledge is a key factor to the promotion of wide Gas Markets in

the MEDREG countries. In light of this, the update of this document, with information from the countries referred to, is considered relevant.

Proposal of way forward

The first action that is proposed to be taken after the approval of this report is publishing it in MEDREG website.

This monitoring report will be updated regularly.