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## ERSE consultation on the implementation of the TAR NC in Portugal



### EFET comments - 17 October 2018

The European Federation of Energy Traders (EFET<sup>1</sup>) has for long committed to working with ENTSOG, ACER and the Commission in order to achieve a EU Tariff Network Code (TAR NC) that enhances the level of transparency and promotes cross-border trade and market integration. We therefore expect the full and correct implementation of the Code by Member States, aimed at reaching the required levels of clarity, efficiency and harmonization.

Therefore, we welcome the opportunity to comment on the ERSE consultation methodology for the implementation of the TAR NC and would like to share a number of high-level considerations:

- As a standpoint this network code aims for a comprehensive regulatory harmonization between member states and especially between regional markets formed by neighboring countries physically interconnected;
- For the development of the Iberian gas market it is essential that both regulators ensure a continuous evolution towards regulatory harmonization of market rules and tariffs, especially of the ones applied to interconnection points;
- As foreseen in the TAR NC itself, regulators should consult between them in order to ensure a compatible evolution of rules and, whenever possible, a common implementation of the network codes. In the present case this has not been possible since so far the Spanish authorities neither have launched a public consultation on the subject, nor have announced how and when they intend to promote the implementation of the Code;
- In the present context, we believe that a more adequate proposal from the Portuguese regulator, would be to maintain the present balance between entry and exit tariffs, until a common Iberian proposal can be attained and implemented; we believe that this would be the best solution for the desired set-up of an integrated Iberian gas market, avoiding the creation of additional regulatory discrepancies and contrary to the objectives of the Code;
- Nonetheless, we encourage stronger cooperation between NRAs and restate our commitment to support the establishment of an organised Iberian gas market.

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<sup>1</sup> The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open, transparent and liquid wholesale markets, unhindered by national borders or other undue obstacles. EFET currently represents more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org)